



www.cyclox.org

contact@cyclox.org

Mr John Cramer
Oxfordshire Highways

PO Box 2
39 Magdalen Road
Oxford
OX4 1RB
07989 869 995 (mobile)

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Dear Mr Cramer,

Proposed amendment to bus/cycle lane orders to permit access to private hire vehicles

Here are Cyclox's comments on the proposal to allow private hire vehicles to use the bus/cycle lanes in Oxford and Kidlington. We understand that the Orders would apply everywhere and not simply in the Botley and Banbury Roads. We **very strongly oppose the proposal** because of the conflict with vulnerable cyclists and the consequent discouragement to cyclists who use the bus/cycle lanes. When you make your digest for the TIC, please ensure that each of these comments is included.

Reason given for making this proposal

- 1) The single reason given for the proposal is "to facilitate the operation of private hire vehicles". In our view this would be a trivial benefit, overwhelmingly countered by the disadvantages described below. The benefit would accrue mainly to the operators of PHVs themselves because of the greater profits they could make from an increased number of journeys. The hirers might possibly benefit sometimes from faster journey times - but the benefit would be illusory since shorter times would not be predictable so hirers would have to allow just as much time as at present. They'd gain nothing.

Reasons for opposing this proposal

- 2) PHVs would come into conflict with other users of bus/cycle lanes, notably the buses themselves but also cyclists. The whole aim of bus/cycle lanes is to prioritise public transport, but interference with buses by motorised private transport will lead to delays. Commenting on the rejected Luton scheme by the (former) Dept of the Environment, Transport and Rural Affairs said: "Increasing the number of vehicles which may use bus/cycle lanes undermines the purpose for which they were introduced in the first place - i.e. to give priority to buses to enable them to provide a better more reliable service, thus encouraging more people to use them...".
- 3) Nothing has materially altered since the decision not to include PHVs (in ?1999) when the bus/cycle lane orders were introduced
- 4) There is no policy within the current Local Transport Plan into which this proposal would fit, and several that run counter to it. The proposal seems simply to originate from pressure that is being applied to many councils throughout the UK by the operators of PHVs at the moment. Fortunately, where decisions on similar proposals have been taken by the relevant authorities, they have often been

turned down (e.g. Luton 2006; Wolverhampton, 2006): Portsmouth does not allow private hire vehicles in bus/cycle lanes. According to your own estimate it is only a minority of councils that do allow PHVs in bus/cycle lanes. Not even Reading is going further than trialling PHVs on one bus/cycle lane for 6 months, and that is after camera enforcement has already been put in place. Oxford has particularly high cycle flows in bus/cycle lanes compared with many other locations and this is a special reason why Oxfordshire should not allow PHVs in bus/cycle lanes.

- 5) No doubt PHV operators will argue that because hackney carriages (“taxis”) can use bus/cycle lanes, then they should too. But the scale of usage will be quite different. There are just over 100 hackney carriages licensed in Oxford city¹, while the number of PHVs is about 450. Therefore the frequency of conflict with other users, including cyclists, will be much greater than it is at present with taxis.
- 6) Roughly speaking, the average speed of a bus in an urban bus/cycle lane, with stops, is similar to that of many pedal cycles. But with taxis, and potentially with PHVs if this proposal is allowed, there is greater conflict with cycles because these have higher average speeds. Anecdotally, cyclists have noted that PHVs adhere to speed limits less rigorously than do buses. The greater speeds of PHVs compared with buses will be likely to discourage overall cycle use, contrary to LTP.
- 7) The proposal suggests that there will be no alteration in signage, perhaps because it will save money, or possibly because of some notion that the permission will be for only a short period (though there is no suggestion anywhere in the published proposal that this is to be regarded as an experiment). But a PHV is definitely not a “taxi” – the confusion between the two in the eyes of the public will only grow greater if official signage does not make the distinction. The Council would be officially sanctioning the disobedience of its own traffic signs, if it lets PHVs count as “taxis”.
- 8) Practically all PHVs are the same models and makes as private cars. The additional markings on PHVs are not sufficiently distinctive from private cars to make it clear why they would be allowed in bus/cycle lanes but cars are not. From the front there is no sign that identifies a PHV. In Oxford PHVs do not carry roof signs. While it is easy to distinguish a taxi and therefore enforce proper usage of the bus/cycle lanes, it will be much harder to do this for PHVs. Enforcement, whether by cameras or police in person, will be extremely difficult. If PHVs are allowed in bus/cycle lanes, the chances of ordinary motorists being tempted to follow suit will be much greater.
- 9) PHVs are likely to try to dodge round buses stopped at bus stops by re-entering the regular traffic flow. These manoeuvres in and out of the bus/cycle lane are inherently unsafe, and will potentially produce very undesirable extra conflicts not just with pedal cyclists but also with all other traffic. This characteristic is the main reason why it would be misguided to think that allowing PHVs into bus/cycle lanes might reduce congestion.
- 10) There is no mention of the cost of the proposal. The Reading experiment on just one lane alone has costs estimated at £10000.

Prepared by Simon Hunt (svhoxford@gmail.com) on behalf of Cyclox, following internal discussions and consultation.

¹ A few more from outside the city may also be entitled, but their use of bus lanes must be essentially negligible