

August 3rd 2021

**By e-mail only:**Your reference: 21/02337/DISC, 21/02339/REM

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Dear Caroline,

**Land off Middleton Stoney Road, Bicester (“Himley Village”)**

I refer to the submission recently made as referenced above to the Council as Local Planning Authority, relating to the discharge of a number of Conditions across the whole of the site consented in outline under the reference 14/02121/OUT.

Stagecoach is well aware that this scheme for up to 1700 dwellings and supporting facilities infrastructure and land uses, including open space, is an important component of the largest single allocation in the Cherwell Local Plan Part 1, the Bicester EcoTown. We are equally cognisant of the salience of the EcoTown in providing for a large proportion of the assessed development needs of the District, and that to date, the inception and delivery of the wider project has proven quite elusive. This is the first substantial residential element of the EcoTown to move forward since the exemplar site was consented and construction commenced in 2015.

Large urban extensions generally pose particular challenges for the delivery of public transport, and the larger the scale of the project the more difficult this is. Phasing and rates of build-out have a critical bearing both on facilitating the provision of bus services at a suitably early stage, and also on their longer-term effectiveness and financial sustainability. We have from the outset made plain to Oxfordshire County Council our serious concerns about the deliverability of an attractive sustainable bus service offer to the EcoTown. We continue to hold the view that providing a relevant and attractive bus service offer to either Himley Village or the wider EcoTown, is likely to be quite challenging.

Here the difficulties are greatly magnified by four separate land-holdings and consents, which straddle a main-line railway, and where achieving any over-arching holistic vision is consequentially dependent not only on overall rates of build, but the point at which major elements of the scheme come forward and important infrastructure and highways links are provided. Stagecoach has drawn the conclusion, based on the national experience and the circumstances prevailing here, that we cannot prudently assume or otherwise rely on any other portions of the EcoTown adjoining this site being delivered and connected to it, in line with the overarching EcoTown Master Plan, in the foreseeable future.

As such, we consider that the current applications need to be treated on a “stand-alone” basis. Our representations are made in that light.

## **1. Dependency and timing of the submissions**

Stagecoach considers that there is an obvious and clear dependency between the establishment of detailed design parameters through the Design Code, and the subsequent formulation of proposals to satisfy matters reserved for determination following the Outline Planning Permission (OPP). While we would be happy to concede many aspects of design can be progressed in parallel, we struggle to see how reserved matters for a large proportion of the development can be properly prepared and submitted until the design fixes that will be provided across multiple themes in the Design Code are properly established through the discharge of that Condition. Such fixes include agreement of bus routing, and the provision of bus stops serving the site, both within and adjacent to it.

The lack of such a steer means that the Reserved Matters Submission fails to provide for buses to enter and leave the site, or safe and convenient access to be provided to the service. As such, the submission falls disappointingly short of a minimum standard of consideration for sustainable modes. We cover the specific areas of concern below.

We consider the submission of the Reserved Matters to be premature, in advance of the Design Code and Phasing of the site being agreed, and having proper regard to facilitating safe efficient and convenient public transport, as NPPF and CDC policy requires.

Moreover, the Government has just published the National Model Design Code (NMDC). This is now a material consideration in planning. There are a number of principles set out in this that have an important bearing on both place-making, and the aesthetic appearance of development, but that also comprehensively provide for climate change resilience on the one hand, and residential amenity and practicality on the other. The standards set at Page 24 and at paragraph 58 for roads intended to act as bus routes – Primary Streets - set clear expectations.

Among these are minimum front-to-front distances, and, by implication, offsets of building lines from kerbs. A substantial buffer of frontages from carriageways allows the incorporation of segregated cycling provision as required by DfT LTN 01/20, as well as street trees and other measures that might also be incorporated to address climate change resilience such as SuDS swales.

Given the very high levels of expectation for the use of sustainable modes set in CDC policy for the EcoTown, we would consider it quite paradoxical if the delivery of this important initial element fails to incorporate what is now considered to be the baseline standard of provision for active travel, as well as for public transport. Given that the frequency and directness of the bus service offer will not reach to levels anticipated by the County Council for many years, if ever, it is that much the more important that the highest possible “level of service” for cycling is provided, to make this the most attractive possible choice to residents, given its central importance in damping what otherwise is likely to be very high levels of personal car use.

We do not consider it possible to consent the current Reserved Matters submission until these and a significant number of other sustainable transport measures are agreed for the wider Himley site, allowing proper consideration and incorporation of these in the Reserved Matters submission from phase one, and all subsequent phases. The lack of any clear provision for bus services, and the failure to address the expectations of LTN 01/20 within any of the current submissions makes very evident how important this dependency is.

## **2. Baseline Position**

Regarding the baseline public transport provision, Paragraph 4.17 of the Design Code is very out-of-date, reflecting material being “lifted” without review from a historic planning application.

Service 25A that previously served the Middleton Stoney Road frontage to the site, was a route operated under contract to the County Council, benefiting from revenue support from public funds. In Summer 2016, the County Council entirely withdrew the budget for all such services. Since that time the service, now numbered 250, has only continued to operate as it benefits from financial support from the Heyford Park development rather further west. It runs broadly hourly, but far from running every 30 minutes at peak times, timetabled resource only allows a less frequent 80 minute peak service interval to be delivered, reflecting the serious impact of traffic congestion at peak times. At the point the current contract expires, we understand that the pattern of service will be reviewed, though it is entirely reasonable to expect that service will be maintained along Middleton Stoney Road in some form. For clarity, Stagecoach has never been the party contracted to provide service 25A or 250.

However, Stagecoach does run the 26 service between Bicester and Kingsmere, every 30 minutes. This has recently been extended to operate through Kingsmere Phase 2 bringing the service quite close to Howes Lane. It would certainly be possible, with the addition of an additional vehicle, to extend the 26 to run to and from Himley Village every 30 minutes. This could offer another credible option to assure a service to the Himley Village site.

### **3. A public transport strategy for Himley Village**

As we discuss above it is impossible to assume that the overarching vision for public transport for the wider EcoTown can or will be achieved, if indeed it could be achieved at all. Irrespective, a public transport access strategy needs to be set out and agreed that allows this site to satisfy within land under the applicants' control both adopted Local Plan policy and the requirements in Chapter 9 of the National Planning Policy Framework (NPPF) at paragraphs 102-103 and 108, which demand that a real choice of means of travel can be offered to residents.

Given the prevailing context, Himley Village can be expected to act, for a substantial period and perhaps in the longer term, as a standalone new settlement close to but outside Bicester. As it is, the developable area essentially sits as a discrete parcel within the red-line, with substantial formal open space within the red-line acting as a buffer to any potential development further north, and a wide established tree belt providing substantial physical and visual containment on the east side. To the south, a mixed-use area means the main residential development stands a distance off from Middleton Stoney Road, and it is likely that this will remain undeveloped for a significant period after residential occupations commence within Phase 1. Existing agricultural land lies to the west, beyond the EcoTown allocation.

Highway connections to adjoining land holdings forming part of the EcoTown are necessary for the final intended pattern of bus access and circulation for the EcoTown to be achievable. The timing and delivery of these are clearly outwith the applicant's control. We note that plans submitted throughout the suite of application documents refer to "potential future connections" reflecting this. A public transport strategy, that maintains a due regard for the wider EcoTown Master Plan, must therefore be put in place allowing Himley Village to benefit from an appropriate level of bus service provision, without dependency on adjoining land.

The EcoTown Master Plan assumes that a bus service will enter and leave Himley Village from the south east, through the land being developed mainly for employment by Albion Land; and also to the north through the remaining land west of the railway under the control of A2Dominion. It is important that this bus routing can be effected in future should those connections be effected. This requires the stretches of road within Himley Village to be constructed in a way that is fit for this purpose. The link between the Principal Street to the boundary with Albion, referred to as a Secondary Street within the Design Code, is as important in this regard as the Principal Street.

However, bus penetration into the site is clearly necessary to bring residents within relatively convenient reach of the service. Absent the off-site links referred to, the only logical alternative is for buses to use a loop between the two proposed access points on Middleton Stoney Road. We have discussed the matter with the Principal Public Transport Officer at Oxfordshire County Council, who will no doubt contribute to a formal response from the Local Highway Authority in due course. Without prejudice to the CHA position, we consider that it is most prudent to look to facilitate the diversion of the existing service 250 into the site between these two access points, which requires two-way bus operation within the site. Engineering for this also offers the greatest degree of flexibility to provide a relevant bus service by other means, such as, for example, the extension of service 26 from Kingsmere to the site.

This would make use of a major portion of the route within the site intended to facilitate the overall public transport route west of the railway. It also allows a slightly longer diversion from Howes Lane and/or the Howes Lane Relief Road, through Albion Land into the site, at the stage that this connection might be provided. Given this parcel is well underway this is much less speculative than anticipating connections to the north. This would provide direct service to the employment and help sustain the longer-term relevance and impact of any bus service offered to Himley Village.

Bus stops need to be provided on this interim route. Passive bus stop provision needs additionally to be made on the wider Primary Road to facilitate the wider public transport vision for the EcoTown beyond Himley Village. We discuss this further below.

### **4. Street Design and Specification**

While the applicant will naturally be steered by formal guidance including Manual for Streets and the Oxfordshire Design Guide for Residential Roads, we would like to point out our own formally published guidance available on line at:

<https://www.stagecoachgroup.com/~media/Files/S/Stagecoach-Group/Attachments/pdf/bus-services-and-new-residential-developments.pdf>

The submitted Design Code covers the design parameters for the street hierarchy within Section 6.

We note and welcome the details set out at page 109 that the Primary Street is to be 6.5m wide. This will appropriately allow two buses or other large vehicles to pass. A 2.5m wide verge will accommodate street trees, which we accept is ample, subject to planting being species of upright habit that avoid significant growth over the carriageway. The verge allows bus stops boarders to be provided, while allowing cycle provision to pass behind avoiding direct conflict.

However, we note shared provision for pedestrian and cycles is proposed, which is not compliant with national requirements set out in LTN 01/20. We support the principle of cycle segregation strongly. The main of many reasons, is that shared provision creates serious conflicts with pedestrians, and these of course, include bus users. The compromises involved in shared provision are myriad and present numerous hazards to all active travel modes, and seriously undermine the attractiveness of all sustainable travel choices.

We note no provision is made for off-carriageway parking in bays along the Primary Street. A continuous frontage is proposed, without individual vehicular access from the Primary Street.

We note from the Reserved Matters submission that rear vehicular access will be provided to frontage properties. This a relatively unusual arrangement, though similar approaches were used in line with previous design orthodoxy set out in the now-withdrawn PPG3 – Housing, between 2000 and 2010. Experience with this, including elsewhere in Bicester at Kingsmere Phase 1, shows that these arrangements set up particular pressure to use the carriageway for parking. There is also a new and rapidly rising use of vans for home delivery that seek frontage access from the carriageway. All this tends to seriously impede the progress of buses. As far as possible a clear carriageway should be provided on all roads intended to act as bus routes. The optimum way to balance these requirements would be through the provision of off-carriageway bays. The alternative, which is less desirable lbeit reasonably effective, would be the use of enforceable parking restrictions, such as double yellow lines, that allowed for loading.

Without high levels of bus productivity, it is impossible to provide a high level of service in developments such as this. The bus simply takes too long to navigate through the development.

We note from section 6 of the Design Code and the Access and Movement Parameter Plan that the other street intended for use by bus, between the south east edge and the Primary Street, is considered a Secondary Street. This is intended to be 5.5m wide. This is insufficient for two large vehicles to safely pass. Two-way operation by buses is not possible. This street should be at least 6.2m wide, in line with our published guidance, as it is required for two-way bus operation under both an interim standalone bus service strategy, and the final bus circulation strategy in the over-arching Master Plan for the EcoTown. Likewise, the secondary connection from Middleton Stoney Road into the site need to be gauged and tracked for bus operation in two directions.

More conventional suburban access to plots is provided from Secondary Streets. We note and welcome more off-carriageway incidental and visitor parking provision. The lower level of vehicular traffic might be considered to make full segregation unnecessary. However, this route will represent one of the main desire lines for off-site trips to Bicester Village, Bicester Village Station, the Whitelands Academy and the town centre, through the adjoining employment land. Therefore, positive consideration should in our view be given to how far the proposed shared-use pedestrian and cycle routes are appropriate. We believe that LTN01/20 standards of segregation are entirely justified. Not only that, but we would suggest that a consistent approach to cycle provision is used on all bus routes, for the reasons outlined above.

## **5. Bus stop provision**

The only bus stop provision explicitly made at any point in the submissions is a single new pair on Middleton Stoney Road. This is neither adequate, convenient nor attractive. It is a minimalist offer for what today is a service of very

limited relevance. However, this provision is important to provide some kind of choice for the very first occupiers, as it clearly would be infeasible to bring any service into the site for some time, until the interim on-site bus route is constructed and open for public use.

To offer scope for a bus service or services being provided in the most flexible possible manner, we would recommend a third stop on the access arm into the site, down-stream of the junction. This will serve the mixed-use area, complementing the currently proposed provision on Middleton Stoney Road. Such an arrangement is good practice and has been implemented elsewhere in the County, for example at Crab Hill, Wantage, and at Curbridge Meadows, West Witney.

Beyond this, it is our view that bus stop positions need to be identified within the site, from a “first principles” approach. We understand that there is a map attached to the Outline Planning Permission specifying bus stops to be provided by the applicant. However this makes assumptions that the whole EcoTown can and will be brought forward in the short term and this is not something we consider it prudent to assume. We point again to our own guidance which makes clear recommendations regarding best practice. We would be happy to advise the applicant’s client team further alongside the County’s Public Transport Officers. For now the lack of on-site bus stop provision clearly is in breach of NPPF paragraph 102, 103 and 108, as well as the allocation-specific requirements in the Local Plan at BIC1.

## **6. Concluding Comments**

Stagecoach recognises that this land forms a very important part of the strategy to meet the development needs of the District and County. The principle of development is established.

However, the aspirations for sustainable transport for this site and the wider EcoTown in policy, were from the outset intended to be an exemplar of sustainable development. They have always been high and remain so. It is therefore especially disappointing that we no real evidence of anything other than a fairly typical suburban development, with provision for sustainable travel modes as a whole having been reduced to that which we would consider unremarkable anywhere in the UK, and objectively poor. The lack of consideration given to bus services is near complete. This runs counter to the spirit and the letter both of NPPF and the adopted Local Plan, including the site-specific policies that carry full weight in decision taking.

We consider the submissions show clear signs of having been prepared to meet an ambitious timescale. The simultaneous applications for discharge of Condition and Reserved Matters for as many as 500 dwellings, offers clear evidence of this, as well as the content of the material presented.

It is clear that significant further work ought to be done before the proposals can be considered to facilitate a real choice to the private car being offered to residents on this development. The land is significantly further distant from the town and key facilities than previous strategic development sites, making car use a much more attractive prospect and that much greater efforts must be made to support the highest quality offer for all sustainable modes to compensate for this. We also note that the majority of homes will be either affordable tenures, or rented. Market rent tenants tend to be more transient, and can have less disposable income, after housing costs, than most affordable housing tenants. It is essential that Himley Village does not set up the conditions where socio-economic participation for a large proportion of future residents is undermined.

Finally, the approach taken on this development should seek to set a standard for the rest of the EcoTown – whenever this does come forward. It is therefore that much the more appropriate that due process prevails, and due care is taken in the detailed design of sustainable travel infrastructure to secure “best practice” standards of provision as far as possible. We respectfully urge the Council and the applicant then, to work collaboratively to ensure that the issues we raise are given due consideration and weight and fully worked through. We are naturally very happy to participate constructively in this process.

As things stand, we do not consider the proposals meet the requirements of policy, including the exemplar standards set out in BIC1 sufficiently to warrant permission.

Yours sincerely



**Nick Small**

Head of Strategic Development and the Built Environment