

February 17th 2022**By e-mail only:**

Principal Planning Officer – Major Developments Team
Place and Growth Directorate
Cherwell District Council
Bodicote House
Bodicote
BANBURY
OX15 4AA

Dear Sirs,

21/04275/OUT: Land Adjoining Lords Lane And SE Of Hawkwell Farm, Lords Lane, Bicester**1. Background, and scope of the development proposals**

Stagecoach is pleased to offer its comments and representations on the proposals for a Mixed Use Development of up to 3,100 dwellings, supporting facilities, infrastructure and land uses on the site referenced above.

The site evidently forms the major part of the allocation BIC1, North West Bicester that lies east of the London – Banbury – Birmingham rail line. BIC1 has always been intended to be brought forward according to the EcoTown principles that were formerly set out in national Planning Policy Statement PPS1a, that was rescinded in 2011. However, these principles have been transcribed into local policy.

The North West Bicester EcoTown (“EcoTown”) was intended to accommodate 6,000 dwellings, either side of the railway, split roughly evenly. This is by far the largest single allocation in the Cherwell District Local Plan Part 1 to 2031, and is one of several strategic allocations in Bicester that together account for the majority of the development anticipated in the District over the plan period. In recognition of the absolute and relative scale of growth this entails, within a fast-growing County, the Council successfully bid for recognition and designation of Bicester as one of a number of Garden Towns and Villages, that qualify for particular government funding to support the delivery of homes at exceptional scale and pace, to a high standard.

The overall delivery of the BIC1 allocation was to be governed by a Master Plan that allowed for the rational and seamless achievement of an urban design that was considered to meet the EcoTown principles. This covered an allocation that lay at the time in at least 5 major separate land ownerships, of which the majority of the quantum was spread across two, under the control of A2 Dominion. This included the current application site, as well as land adjacent to the immediate east, accessed directly from the B4100. An exemplar scheme of 394 dwellings was brought forward and consented as a departure from the then-adopted development plan by A2 Dominion on this site (10/01780/HYB) and this has only recently been completed.

The vast majority of the of the BIC1 allocation was the subject of a series of separate planning applications 2014, all of which followed the overarching Master Plan for the allocation. Together, these accounted for a

residential quantum of up to 5,350 dwellings. When added to the Exemplar this brought the total number involved to about 5,750 units. Of these, 3,500 were accounted for by the two A2 Dominion interests; 2,600 on a site that roughly accorded with the land subject of the current application east of the railway (14/01384/OUT), and 900 on land to the west (14/01641/OUT). However, a substantial portion of the allocation west of the railway was never the subject of a developer interest and never brought forward as an application. This land could have accommodated several hundred further dwellings.

You will, naturally, be aware of the wider planning history of each of these. Suffice it to say, of the 2014 applications, Stagecoach is aware that only two were progressed to a consent being issued, being the Himley Village scheme off Middleton Stoney Road, and adjoining land mostly earmarked for employment immediately south east of this at the junction of Howes Lane and Middleton Stoney Road. This latter is largely built out. The first reserved matters have been submitted for Himley Village.

The lack of progress towards releasing consents and moving towards delivery elsewhere in the BIC1 allocation has had a number of significant consequences. From our perspective, the greatest of these has been the decision to remove the Howes Lane Relief Road from the Future Oxfordshire Partnership's ("FOP") infrastructure capital programme. This important element of enabling infrastructure addresses the lack of highways capacity around the north west fringe of Bicester by providing a generally off-line improvement between the B4100 Banbury Road in the east and the B4030 Middleton Stoney Road in the west. An improvement to the B4100/A4095 Banbury Road roundabout is nevertheless being separately progressed shortly. We note that a pair of major structures to carry this and a pedestrian and cycle link under the railway line have been implemented, which at least takes these costly and high-risk elements off the critical chain. Nevertheless it is now very unclear when, or even if, the Howes Lane Relief Road scheme is to be implemented.

The second consequence is that land that formerly lay within the A2 Dominion control forming part of the eastern site and lying immediately east of the current proposals, has broken away from a consolidated promotion and is now under a new, separate promotional agreement. It is subject to a currently undetermined application for up to 530 dwellings (21/01630/OUT). This in effect forms an extension to the Exemplar site. Land to the east of the Exemplar between it and the B4100 at Home Farm is also included in that application. If consented, this would create a reasonably coherent consolidation of the Exemplar area hanging either side of the existing spine street, Charlotte Avenue, and taking advantage of new Primary School and local centre already delivered. While in many ways this is to be welcomed, it also seems in practical and master-planning terms, to have "driven a wedge" between the bulk of the former A2 Dominion control and the existing Exemplar. We turn to the negative implications of this for sustainable connectivity and bus service provision in depth later in this response.

Despite the loss of this land from the consolidated holding that was subject to the previous A2 Dominion application for 2,600 dwellings, the overall quantum sought in this new submission has risen to 3,100, adding 500 units scope. We recognise that there is certainly plenty of scope within the undelivered policy quantum to seek to optimise the capacity of the site, including through increased densities.

Furthermore, we would in principle be very supportive of the broad principle of consolidating the BIC1 quantum east of the railway. Looked at with the 900+ units on the exemplar and Firethorn site, 4000 dwellings is evidently quite capable of being delivered between the railway and the B4100. Subject to the site coming forward at pace, and following a rational and well-conceived master-planning and phasing exercise, this would be materially more likely to support a reasonably relevant bus service offer, than the previously-anticipated approach, that would have delivered about 3000 across broadly the same area.

This would leave the remaining 2000 or so units to come forward on the already consented sites off Middleton Stoney Road, which are quite capable of standing reasonably alone and account for a consented combined quantum of 1850 dwellings, plus employment.

In establishing these preliminary conclusions, we need to also stress that this broad locality, as well as the site itself, starts off as being one that is extremely challenging to provide relevant and attractive bus services within. This is because:

- The pre-existing town of Bicester is relatively compact, meaning buses have little relevance for local journeys, while the relevance of the town centre as a major destination has until recently been very low, certainly for bus journeys.
- Its rapid development since 1987 has largely been for owner-occupied tenures, skewing the demographic strongly towards those who are most likely to be car owners and users.
- The urban structure of the town arises from the 1980s and 1990s where urban extensions at Bure Park and Southwold in particular did not seek to accommodate buses within them. Equally, radial routes alongside them were treated as sterile car-dominated environments, as was the A4095 peripheral route on the outer edges, that were equally not anticipated to accommodate bus services, or even provide bus stops where services were available. Buses were in all practical senses, “planned out”.
- The expansion of the town in the 1980s and 1990s was largely conceived and justified to act as a dormitory, especially for the City of Oxford. This has meant that travel demands are expressed in multiple directions out of town, and the easy access to the M40 and SRN, as well as to Aylesbury has further supported these kinds of car-borne lifestyles. More recently, local jobs creation has accelerated – but these jobs are on the town’s extreme periphery and with the exception of Bicester Village Retail are not on bus corridors.

The result is this is that there is very little in the way of a pre-existing bus service near the site – much less adjoining it – on which provision to these proposals can build. We cover this in more detail in the next portion of this response.

2. The baseline public transport position

The BIC1 site leapfrogs the A4095 that acts as the town’s current outer edge. This means that the application site extends from its southern boundary, which is about 1800m from the public transport hub at Sainsburys, Pioneer Square, to a new proposed outer urban edge about 1600m further north west. The application red-line, notably incorporates significantly more land outwith the rather arbitrary outer limit in BIC1, which does not reflect any kind of physical constraint, landscape units, or even any physical delineation on the ground.

The wider area between the railway and the B4100 is a similar dimension. However the intervening Exemplar site and Firethorn land mean that the eastern extent of the redline is generally a least 500m offset from the B4100 – as the crow flies. In fact, direct pedestrian and cycle permeability to the B4100, and existing and potential bus stops on that road, is very low. This becomes highly relevant when the short-medium term position regarding bus service availability is considered.

Were there to be any meaningful public transport provision in Bure Park to the south of the A4095, or even serving Bucknell Road immediately south and west of the railway, this might be less of an issue, since the extension or diversion of such services into the site ought to be relatively straightforward. No such services exist. In fact, they have never existed – revealing a great deal about just how far the existing town has developed around a suburban car-dependent paradigm.

We note the comments in the Transport Assessment prepared by Jubb for the applicant, regarding bus services in the area. These rightly, pick up on the current availability of two bus services that pass east of the application site broadly using the Banbury Road and B4100 corridor.

The E1 service is predicated entirely on the needs of the Exemplar, and has been operating for about 5 years, though it has only been able to operate through the whole development for about the last 2. It is operated under contract by another local bus company and stands alone as a “shuttle bus”. This means that the value proposition to connect onto other services, including our own S5 and X5 services to Oxford, is impaired by the fact that seamless ticketing and passes for the wider network are not available. This contrasts with a similar local service we operate to Kingsmere in Bicester on behalf of that developer, again using a single bus operating a half-hourly cycle. E1 runs north up the B4100 and then turns left into the exemplar site and returns to town running through the development from north to south only. A stop on the B4100 northbound at the southern access point allows those returning from town and living at the southernmost end of the development to avoid a longer than necessary trip.

The contract for the E1 has about one year left to run and the associated funding has a little longer until it is exhausted. Based on our own experience at Kingsmere, which is a very much larger development of over 2500 dwellings, about 2000 currently occupied, including a secondary school and a significant local centre, and where we have been operating since September 2014, we see no conceivable way that this service comes close to covering its operating costs from passenger usage, even having regard to some use to and from intermediate stops on Banbury Road. We will return to this matter, and its implications for the longer-term sustainability of an offer to the Ecotown, later in this response.

Stagecoach service 505 commenced in December 2019 just prior to the onset of COVID. It runs hourly direct between Brackley and Bicester. Covering only demands between these two points, it has, perhaps unsurprisingly, not developed revenue especially fast, though COVID has affected the service severely. Nevertheless West Northants Council, who have contracted the service using developer funding from Brackley, were quite pleased with loadings set against previous attempts to improve bus services from Brackley to Towcester and Milton Keynes, which garnered minimal response from the public.

Stagecoach has long considered this link makes more sense as an extension of Oxford-Bicester services. However, for a number of reasons we have not felt in a position to take this forward thus far. Extending that offer as far as Northampton could well also transform the overall relevance and attractiveness of the public transport offer on the A43 corridor, but this is evidently represents a very high opportunity cost and risk.

We are in an uncomfortable position where it highly unlikely that 505 can justify continuing in its current form, but it is equally unclear the basis on which a more rational incorporation of this into the wider network can be sustained. Therefore, the applicant cannot rely on this service being in place by the time the application is determined, much less beyond that point.

In any case, service 505 serves only a pair of stops at the southern access to the Exemplar, close to the A4095 roundabout. This is highly tangential to the area covered by the application.

We accordingly would advise that **the applicant and other stakeholders, including the Local Planning Authority would be prudent to assume that neither service E1 nor 505 form part of a secure baseline level of bus service provision** within the broad vicinity of the site. This is a rather different conclusion than that presented in the applicant’s Transport Assessment.

Regrettably, it is not possible to avoid the conclusion that there is no existing bus service offer on which to build. **This requires an all-but-standalone approach to be taken if the development is to benefit from public transport provision.**

3. Bus service specification and design: the lessons from Kingsmere

Kingsmere, referred to in the previous Cherwell Local Plan as “South West Bicester”, has been the main focus of development activity in Bicester since 2010, when activity started in earnest. It forms a single identifiable neighbourhood south of the B4040 Middleton Stoney Road and west of the A41 London Road. It was consented in two main phases, the first for 1650 dwellings that was later extended to 1750, and a second for 650, on which work continues. A further smaller land parcel has also been submitted for a change of use to residential from a medical facility. The project has delivered 30% affordable tenures in line with policy requirements prevailing at the time of determination.

The location of Kingsmere benefits from a great many advantages for sustainable mode use than the application site. Most of it lies a great deal closer to the town centre and other major facilities. From our perspective, out frequent trunk S5 and X5 services to Oxford both run along the western frontage, providing up to 6 buses per hour from stops at Bicester Village. Facilities at Bicester Park and Ride allow for cycling and kiss and ride, as well as plentiful free parking, so that for those residents at the western end of the development that extends up to 1500m away from the A41 stops, this presents convenient means to access the S5 service. Finally, at peak times, we divert S5 half-hourly (alternate buses) through the development itself. This is only possible as we are already passing the site en-route to Oxford. These journeys carry meaningful loads to and from the development.

The developer obligation sought a minimum half-hourly frequency local service to Bicester town centre and peak journeys to Bicester North station – at the time, the only main-line rail service in the town. This supplemented the peak service to Oxford. This operates as service 26 with just one bus circulating on a simple and relatively efficient loop. The entire spine road has been available to the service through Phase 1 since 2016, and we were able to extend the loop, with a little “value-engineering”, through phase 2 in mid 2021, directly picking up the westernmost parcels. The loop also serves adjacent existing development north of Middleton Stoney Road. We also agreed to revise the service to operate on every journey across the town centre to Bicester Village Station. Though this was implemented, it took effect just as COVID travel restrictions were put in place and has yet to demonstrate much usage.

We simultaneously agreed to combine the operation of service 26 with a separate half-hourly facility funded by OCC with separate developer funding sources that meant buses continue seamlessly beyond the station to Graven Hill and Ambrosden, beyond which 1 bus per hour continues to John Radcliffe Hospital, Headington via Islip as service H5. As such, the former local shuttle has now been incorporated into the wider local network in a way that presents a rather larger range of credible options to use the bus, both to and from Kingsmere.

Tracking the patronage development against completions since the service started on a monthly basis, prior to COVID with the developer, has consistently shown that the demand for the local facility was never going to become close to a level necessary to allow it to be sustainable in the long term, with 2500 completed homes. This is quite a concern given that typically the demand arising from 1400-1600 homes would typically be enough to support a single additional vehicle in the network, especially at this tenure mix. Here, a combination of factors has truncated demand for the service, principal among which is the proximity of the route to another better inter-urban service and the fact that most local destinations are quite accessible by cycling or even walking from much of the site. The 30 minute frequency is sufficient to realistically only appeal to essential non-discretionary use, which on a site like this will be a relatively small portion of residents. Interestingly, peak mode share for car use as measured by resident survey was under 50%, reflecting to a great extent the value offered by active travel.

The application site does not benefit from these locational advantages, however. It is much more distant from local destinations, and it cannot “piggy back” on an established frequent inter-urban bus service. Severed to a great extent from the existing neighbourhoods in the town by the A4095, these present little in the way of readily accessible facilities to initial occupiers on the site. As a result this risks the initial phases being largely car-dependent islands of development, until supporting infrastructure and facilities come on line. This would include any public transport offer provided.

To inform the public transport strategy for the application site, we would conclude from this experience as follows:

- Bus service to the Ecotown need to be available to residents as soon as reasonably feasible
- It needs to offer as direct a service to the key destinations and interchanges as possible, though really needing to leverage patronage from existing communities en-route as far as possible
- The productivity of the vehicle needs to be exceptionally high to maximise the level of service offered for the amount of resource required. A round-trip from Manorsfield Road, and ideally the Bicester Village Station, around the full route needs to take comfortably less than 25 minutes, especially off-peak.
- 30 minutes frequency offers an insufficiently relevant choice for local journeys. 15 minutes should be the target. A combination of demands from the Exemplar and associated land, the proposed development, and neighbourhoods en-route to the town centre not currently well-served ought to have a reasonable prospect of being sustainable, if no more than 2 buses are needed in the cycle.
- To achieve this, the bus access and movement strategy will have to be a key element within the set of driving principles in urban design. Attempting to retrofit the service route into a pre-determined master plan will lead to a high probability that the development, even at full build out, will at best be left with a basic service at minimal frequencies, with little uptake, requiring substantial ongoing public funding support to be maintained.

4. Urban design – lessons from the Exemplar

It is notable the amount of care and focus that is not being applied to designing for cycling in urban developments, and especially large urban extension such as this. Local Transport Note 01/20 has crystallised a sea change that is having an immediate impact on approaches to street design across England, many would say, not before time.

The same level of care and interest has yet to be afforded to designing to accommodate high quality bus services, despite our own published guidance to applicants and development stakeholders, and further advice from the Chartered Institution of Highways and Transportation published in 2018. By now, we would have expected urban design approaches to have started to take some of this insight on board. We are hoping the Government’s “Manual for Streets 3” to be published shortly, will help “level up” the status of bus within urban design. However, useful principles for Principal Streets, that will accommodate bus routes, have already been set out in the National Model Design Code.

The bus route in the Exemplar is far from exhibiting good practice. It is engineered in such a way that a “lowest common denominator” approach is taken to speed control, which in practice, to the extent it is effective for general traffic, only serves to slow buses disproportionately. Intricate, quite tortuous street alignments combined with narrow widths, a very high frequency of driveway crossovers and minimal set-backs of frontages from the kerblines actually in practice both reflect and reinforce the fact that design is driven by cars, and their storage and use, above almost all else.

Buses have to “fit in” to streets designed for the car – if only to tame their speeds. Unrestricted on-carriageway parking is seen as being desirable – to control traffic speeds. Of course, it is also desirable if the objective is to maximise the amount of parking available per unit developable area and pavement cost.

In the Exemplar Site:

- Street widths at 6m are barely sufficient to allow 2 buses or other larger vehicles to pass. This tends to make it difficult other than to run routes one way. This extends journey times in one direction and makes route hard to understand. While this might have been expedient in the exemplar being a linear built form running parallel with a straight main road alongside, allowing buses to run quickly out to the far end of the loop, it will not be within the main body of the allocation.
- Sharp ends are encountered in relative quick succession. Again, they are not tracked to allow larger vehicles to negotiate them without oversailing the carriageway centreline. In these circumstances, for a bus, every bend in effect becomes a give way sign – but not for cars.
- There is a setback of less than 5m between the kerblines and most habitable windows. On extended lengths of Charlotte Avenue this separation from moving buses reduces to just 3m. The bulk of buses, even electric ones, therefore impinge on amenity. Were double decks ever to be used upper deck passengers can appear to have views into bedrooms. These separations are completely insufficient. This also presents issues for ambient noise – and it should be noted that electric buses are far from silent.
- In these situations, another issue is presented by waiting passengers at stops immediately outside properties, which is understandably seen as being very intrusive by many people. Locating shelters involves serious compromises with daylighting on neighbouring among other things, and is practically impossible. Unsurprisingly in the Exemplar, none are provided.
- The proliferation of driveway crossovers causes many problems. One is that it becomes exceptionally hard to locate bus stops optimally without impinging on driveways. It also counter-intuitively encourages on-street parking as typical 3-bedroom dwelling frontage widths of 6-7m represent a convenient car's length between the dropped kerbs.

In fact, where bus circulation and passenger facilities are concerned, the Exemplar offers nothing that is either innovative, helpful or worthy of commendation.

For the current application, we therefore strongly urge the applicant and its client team to incorporate best practice, starting with NMDC, having regard to LTN01/20, and Manual for Streets 3 which will be published shortly, and our own and CIHT's published advice and best practice.

5. Phasing – lessons from Gravenhill

Gravenhill is a project of broadly similar physical scale and ambition to the application site. We recognise there are some very great differences, the biggest being that it is previously developed land that is being vacated progressively by the former occupier, and that it is being developed on a "self-build" basis. Both have presented particular constraints on the delivery rate and phasing of the project.

However all large scale development projects suffer from constraints of various kinds, and properly anticipating these and ensuring that phasing is properly considered to avoid these having a seriously deleterious impact on the provision of bus services should form a part of the process of preparing an application that is suitable for positive determination. Many of the serious problems identifiable at Gravenhill are far from unique, and are regularly encountered on other major developments – brownfield and greenfield. They are amenable to being mitigated by care and forethought.

The following has seriously hampered the introduction of any bus service to the site, as well as being likely to greatly reduce the effectiveness of the service we are able to deliver:

- The site is dependent on a single access point and will be for an exceptionally long period of time. There is no way to provide an efficient route through the site, as a second point of access and a logical bus route between them is not envisaged to be available for a considerable period;
- Little if any thought was given to a phasing strategy for bus service delivery prior to consent. There was no set trigger for the introduction of the initial bus service, or any plan to effect such a service at any point specified or otherwise. As a result, it has taken several years after first occupation to get a bus service of any kind onto the site.
- The current single stop is, in effect, the result of a set of tactical decisions, and in most respects was at the discretion and grace of the developer and its main contractors. The development phasing is such that we see little prospect of better arrangements being made available in the foreseeable future.
- Without the ability to penetrate further into the site, and safely turn, the stop is sited close to the site entrance. As a result of that, many occupied plots are a very considerable walk away from the service, along streets that are also under ongoing construction. This problem will certainly get progressively worse, to the point that it is currently hard to see how much of the development will be within 400m of a bus stop for the foreseeable future.
- Construction operations are being progressed on multiple fronts along streets that are proposed for eventual bus operation. Even if these streets provided an eventual logical bus route, they are not safe for bus operation, and are unlikely to be for a considerable period of time. In particular, we generally avoid streets where plots are not yet roofed, and where deliveries of materials are being made to frontages under construction: buses and telehoists with unsecured loads do not mix well.

These problems are seriously compounded by urban design matters, but we need not elaborate those points as most are already made in respect of the Exemplar.

All these issues need to be tackled in an intentional and considered manner through the agreement of key triggers, dependencies and parameters at outline stage. We would respectfully but strongly advise stakeholders that these should form the basis of clear planning conditions and/or developer obligations, to secure the agreed outcomes.

6. The proposals

It must first be emphasised that the Master Plan submitted with the application, including the movement and access parameters plan, diverges quite materially from the overarching Ecotown Master Plan that steered the 2014 applications.

That said, we were never enthusiastic about the approach to bus movement and circulation that the previous applications proposed. Indeed, we had some very fundamental concerns tempered only by our belief that they were unlikely to be actually built out, as has indeed proven to be the case. The renewed application offers a vital opportunity to properly apply best practice in urban design for public transport, as well as active travel modes. Given the context of Bicester and the scale of the development, this opportunity surely cannot be foregone.

It is regrettable that there is little in the proposals that gives much indication that facilitating a high quality public transport offer through a deep and comprehensive understanding of the necessary principles has been especially high in the client team's design approach. **Any material divergence from the same formulaic approach typically used to structure urban extensions in the English shires is extremely hard to discern. This has typically produced exceptionally high levels of car dependency.**

6.1. Transport and mobility demands and impacts

We assume that the approach taken in the Transport Assessment prepared by Jubb UK for the Applicants has been scoped and agreed with Oxfordshire County Council. We note that a greatly lesser trip rate is now assumed. This has been done on a “predict and provide” basis – in other words the planning application has been prepared with regard to predicting levels of demand for car traffic, and only that. The credibility of other mode choices, and the practicality of their provision (including phasing and timing of inception of key links) forms no part of the application. Public transport provision is this simple treated as a “box to be ticked” and as such, there is little need to address any more than quite superficially. Such an approach is entirely typical, and in fact reflects the approach of the Local Highways Authority to assessing planning proposals.

As always, paragraph 111 of NPPF is quoted at a prominent point in the submission (including para 5.2.6 of the Environmental Statement). A level of traffic impact that falls to be judged as “less than severe” by a reasonable decision-taker, in the context and meaning of NPPF paragraph 111, is in practice impossible to make. So evident is this, that we conclude that it was obvious to the officials that drafted the statement to begin with and the intent was always to ensure that traffic impacts would only form a determinative reason for refusal in the most exceptional of situations. Practically speaking, given that no threshold is set or determinable, we read into the quoting of this statement an implicit warning to the planning and highways authority, that no robust stand should be taken on highways and transport impact matters, as it could never be defended as a reason for refusal.

There is ample evidenc for this. In over 10 years of operation of NPPF, virtually no planning application has ever been found to fail the “severity test” in NPPF. The egregious example is Peel Hall Warrington, which has been subject to two decisions recovered by the Secretary of State within two years, and where a previous planning balance that hinged on this very point has now been overturned. We note in an increasing number of cases, in areas already subject to exceptionally high levels of network delay and unpredictability, the arguments typically advanced in favour of setting traffic impact considerations aside in the planning balance can be broadly summarised in terms of “the problems are so bad, our development will not make any difference sufficient that anyone will notice”.

We have even seen the case argued successfully in front of PINS, that an additional 3 minutes delay at a particular junction, amounts “only to less time than a single song that the driver will listen to.”

This logic does shed very helpful light the influences on travel choice and behaviour. A car owner’s propensity to drive is affected minimally by the congestion that will be encountered, and the most extreme adjustment that is likely to be made is to alter the timing of the journey. The value of time, once on the road in the comfort of one’s own vehicle is offset against the exceptionally high level of convenience and flexibility it offers for a journey from door to door. This explains why motorists are reasonably content to endure more or less predictable delays of well over 20 minutes on a regular basis.

However, the Government now expects sustainable modes to become the “natural choice” or most journeys. The applicant, the planning and the highways authorities therefore need to consider a great deal more carefully what needs to be true in respect of bus service provision and its attractiveness set against car use, in terms of its quality, reliability and efficiency. There is no evidence of this consideration being given. A “predict and provide” methodology actually runs entirely counter to such consideration being made.

We need not labour this point. However another logic does need to be introduced – **the cumulative impacts of traffic congestion arising from development on bus services over the last 20 years are one of the largest single causes of the reduction of bus services, and contraction of entire networks to evanescence.** One direct corollary of the application of para 111 of NPPF is that bus services have become slower, more unreliable, and less relevant to the public, whether living on new developments or not. As

operating costs steadily rise and patronage gradually falls, frequencies are cut, to the point where services are simply no longer worth maintaining. This also should be obvious.

We have deep concerns about the agreed methodological approach taken by the TA. Given the location and scale of this scheme, and its intent to be at the vanguard of sustainable mobility and carbon reduction, Stagecoach considers it quite appropriate to challenge all parties, hard, on this point.

6.2. Bus access and circulation

We note that within the adopted North West Bicester SPD, at Principle 6, it requires that walking and cycling should be the first choices of transport. However we do not think it is a credible position to take that this should be assumed to be a “bus free development”. Nor does the applicant take this position as evidenced at pages 49 and 88 of the Design and Access Statement (DAS).

- *“High quality bus routes will be provided, diverting into the site, or facilitated to support frequent and direct bus connection to the rest of the NW Bicester allocation and to other key local destinations;*
- *The majority of the dwellings will be within 400 metres of a bus stop with all dwellings within 600 metres of a bus stop.”* (Design and Access Statement p. 49; 88)

However, given the clear challenges to public transport provision that we outline above on a development of this kind, in this specific locality, we must stress that the ongoing provision of a relevant bus service depends on a high degree of thought and intentionality on the part of the developer’s team, and both the County and District Councils, performing their respective roles. Without this, like much of the rest of the town, the development could be practically devoid of a public transport choice.

The success and impact of bus service provision to and through the appeal proposals hinges entirely on a bus reliably and consistently making good progress, on a single route that is reasonably conveniently accessible to all plots, and provides a direct, and easy-to-understand route to key local destination/s. The hinterland for the service should be optimised having regard to these principles.

We were far from convinced that the previous SPD Master Plan Framework for the wider Ecotown site achieved these objectives as well as it might. The applicant has elected to move away from that approach and this provides an important opportunity to achieve a much better solution.

In the case of the application site, and given the absence of a secure local bus offer on which to build, the service offer needs to leverage the existing and proposed development at the Exemplar site to the east, especially for the initial phases of the development. Therefore **the vehicular connection to the Exemplar such that it is useable by buses in two directions, is of the essence.** We see that this is provided for as an extension of Cranberry Avenue. This link has wider significance as it connects the application site directly to the existing Primary School and local centre, which ought to be an important consideration in ensuring that residents on early phases do not need to leave the site for these kinds of purposes. We wholeheartedly endorse this approach. It may be that this is restricted to buses and sustainable modes only.

Looking from first principles, the two main arterial routes to Bicester, that broadly lie east and west of the proposed development footprint, are separated by about 1400m at most. The site extends north of the A4095 on its southern boundary by a similar distance of about 1500m. It ought therefore to be possible to establish a bus route that puts the vast majority of the development within about 450m of a bus stop, without the need for multiple bus routes or excessive circuitry within the site.

The A4095, and the urban design of Bure Park, effectively sterilises the southern boundary as a point of access for a logical bus route. This suggests that either, or both, Bucknell Road and Banbury Road could be used to reach the site; and that, at full buildout, the a predominantly east-west orientation of the bus spine through the site would offer the scope to run buses to and from the site via either or both routes. If the latter solution were chosen, this would helpfully leverage a much larger catchment from existing development,

and also modestly assist in providing direct links to a wider range of destinations, such as both Bicester Academy and Bicester North Station.

The Framework Master Plan, commendably, proposes a simple and reasonably direct “primary street” through the site, running from the A4095 in the south east, back towards the A4095 at a point on the proposed Howes Lane Relief Road east of the Bucknell Road at the proposed mixed use local centre. This is anticipated by the applicant to accommodate the bus route. This revised approach is broadly somewhat better than the rather more indirect and intricate route previously anticipated in the SPD.

However, it is aligned in such a way that extensive areas of the development are likely to lie further than 500m away from a bus service, especially towards the north and west of the site. This does not optimise the relevance of public transport to the broadest number of residents, as the public transport strategy ought.

To be clear, we concur with the applicant that the main (primary) street should accommodate bus services, and we do not believe that using the secondary street loops as shown on pages 48 and 88 of the DAS, to accommodate the bus route/s, provides a sufficiently good level of service for bus operations, or sufficiently efficient routing. However, we do not consider that having a large number of dwellings well in excess of a 400m walking distance of stops is appropriate, if it can easily be avoided.

We support the approach to the design of the primary street set out at page 92 of the DAS. This includes:

- 6.3m carriageway width – though this will require widening on ends to allow two large vehicles to safely pass and avoid buses having to cross the carriageway centreline
- 1.5m “with flow” stepped dedicated cycle tracks on both sides of the carriageway, compliant with LTN 01/20.
- A 2.5m verge or parking bay “buffer”. We would encourage incidental parallel parking bays to be maximised on the line of the street, while being consistent with the expectations in national policy that street trees should be incorporated. This will minimise on-street parking and allow buses to make efficient progress. It will also make it much less likely that the stepped cycle track will be abused by parking.
- 2m wide footways.
- This arrangement secures a minimum 6m amenity offset between the carriageway and dwellings curtilages, with a greater standoff for built frontage. This therefore means the stand-off of building lines is well above our recommended minimum for bus routes.

The approach to siting bus stops is confused, as it is unclear the basis on which the route is intended to circulate, especially with regard to the tie-in to the Exemplar site. The level of detail provided to explain the positioning of the stops in the DAS at page 88-90 is inadequate. We do not understand the design logic for the positions suggested. To provide only two bus stops on a development of this kind runs entirely counter to established practice and diverges even more from good practice advice promulgated by the relevant professional body, the Chartered Institution of Highways and Transportation, as well as ourselves, with which the applicants consultants should be well apprised. The provision is “minimalist” to a degree that is quite troubling. Set against the approach and care given to cycling this presents a stark contrast.

While Banbury Road presents a logical route from the site to the town centre, as assumed in the application, it is clearly not the only one, nor, in our view, is it clearly superior to Bucknell Road. The proposed large one-way terminal loop runs alongside Bure Park along the A4095, which we note remains a “Bypass” road, which is likely to get substantially busier, and on which Bure Park turns its back. This routing should not be assumed to meaningfully allow Bure Park to be served, nor is it clear the applicant is proposing any bus stops for this to happen. We would urge that Bucknell Road is considered to present at least as valid a choice for a bus route to serve the development, and this logic informs the points we make below.

The proposed primary street alignment also leads to an unhelpfully indirect routing as the bus leaves the main radial Bucknell and Banbury Roads or picks them up to return to town, especially on the western flank of the scheme. On the eastern side of the development it would probably be preferable to continue up the

B4100 Banbury Road and then through the Exemplar using Charlotte Avenue to enter the site via Cranberry Avenue.

However, on the western side of the development it appears much more appropriate to seek to slightly extend the main street loop to pass to the north and west of the existing Hawkwell Farm complex (that lies outside the redline) and tie into Bucknell Road. This might take the form of a displaced priority junction that incorporates the existing road into the development circulation route. Bucknell Road would need to be widened and possibly reinforced. We note that it is already proposed to divert Bucknell Road into the site at the Secondary School site as it approaches the A4095. This arrangement would need to be slightly adjusted to increase carriageway width and ensure that geometry would properly accommodate the function of the road.

We note the comments in the Design and Access Statement at pp 22-28 about the heritage constraints, and the landscape character and quality. This indicates that there is an unusual degree of latitude in how the development is structured, and that landscape, ecological and heritage constraints do not bear such that this routing is inappropriate or more strongly precluded on these kinds of grounds. In fact we note that the indicative development structure would well facilitate this without the need of a major re-work of the key parameter plans, and matters like the development land budget.

This more northerly alignment has a number of other benefits, one of which is that the main street does not need to cross the main open space “green loop” corridor that runs along the River Bure, at its widest point, making that area much better able to function as a unity, for all kinds of recreational, ecological and hydrological purposes. It also ought to help mitigate development infrastructure cost, which will inevitably be high on a project of this scale. Finally, and follow from the preceding point, it might from first principles prove to be easier to deliver the full spine road at a somewhat earlier stage in the development life cycle, with very great benefits to the ability to provide a bus service to all residents sooner rather than later.

The bus route spine really needs to tie in, as seamlessly as possible, to the Bucknell Road south of the railway. The current main access point on the proposed Howes Lane Relief Road at the local centre anticipates four arms, the southern one currently intended merely to provide development parcel access. This could easily be amended to create a direct route for sustainable modes leading straight to the existing skew bridge. This would directly help sustain higher mode shares for sustainable modes, as motorised traffic at this point would be forced to use the realigned A4095 to the east or west and this offers a very much less direct route to the town centre and other key destinations such as secondary schools and the station.

This directly aligns with the SPD at Principle 6, that the Ecotown should employ filtered permeability principles. In fact, the proposals fail to otherwise exhibit the application of these principles.

The alignment of the main street is also such that we anticipate concerns being raised about excessive speeds along it. A very effective means of achieving the necessary balance between traffic calming and the directness of routing of all sustainable modes would be to apply two or more “plugs” along the route that can only be used by buses, and cycles. These could even take the form of bus gates. Permeability would be maintained for motorised traffic by using the secondary street loops, with a more circuitous route around the plugs and, in all probability, several changes in priority. Anyone could drive anywhere, but in practice, other modes are likely to be, relatively speaking, much more attractive. We would be happy to advise on the detailed design on these kinds of arrangements.

All of the above would support and reinforce achievement of the Vision Principle set out in the DAS at p44, that the proposals will effect *“Management of traffic through realignment of Bucknell Road and traffic calming measures along Bucknell Road to actively reduce traffic numbers and manage by design traffic on Bucknell Road.”*

Finally, we would urge that the applicant assumes that the bus route runs in two directions through the site and that street geometry and bus stops are sited accordingly.

6.3. Development phasing

We can find no reference within the comprehensive application documentation to a phasing strategy or plan.

We have highlighted already that even the best conceived master planning cannot mitigate the impacts of a phasing strategy that prevents a bus service effectively penetrating and circulating through the site so that at all stages of the development a meaningful public transport choice can be offered.

Ideally a development should be able to leverage existing provision for its initial phases. As we explain above, this cannot be assumed in this case.

However it is rational to seek to take advantage of the existing population at the Exemplar, and associated development adjoining it, to try and help anchor a reasonably useful albeit basic level of bus service, to serve the early phases of development. The Exemplar also has an existing primary school and local centre. It seems to make sense that development should mainly be phased from the east, progressing west and north.

It is evident that this matter is one where the applicant is either looking to agree a strategy at a later point, perhaps through planning conditions, or is seeking to maximise the flexibility to implement in a manner that best suits its commercial interests.

While we have full sympathy with the need to retain appropriate flexibility and avoid unduly burdening development viability with excessive infrastructure costs at an early point in the development, we must also stress that an appropriate balance needs to be found. We have a great deal of experience advising on this kind of issue nationally and would be happy to work collaboratively to agree the optimal strategy with the applicant and with County Council and LPA officers.

7. Concluding Comments

This is among the largest development proposals ever tabled within the District and County. In seeking to implement the aspirations of the North West Bicester SPD and its EcoTown principles, as well as nationally promulgated and more recent "Garden Towns" prospectus, it is pursuing a very much higher level of ambition regarding sustainability than a typical development. The role of public transport in securing these outcomes should accordingly be maximised.

There is much to welcome in these proposals. In many respects, they are a considerable improvement on those that secured a Resolution to Grant by the Council on broadly the same site in 2016.

However, there are several important areas where further work is needed to ensure that the best possible public transport provision can be offered. At this time, Stagecoach therefore cannot support the application.

We naturally are very happy to work collaboratively with the Councils and with the applicant's client team to ensure that the issues we raise are fully explored to inform the evolution of the proposals, and a successful resolution. Please contact me to discuss further any of the matters that we have raised.

Yours sincerely



Nick Small

Head of Strategic Development and the Built Environment