

April 6th 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,

22/00747/OUT Land at Bicester Road, Kidlington (Allocation PR7a South)**1. Background**

I am writing on behalf of Stagecoach West to offer our observations and additional information regarding the development proposals on the southern of two land parcels that form allocation PR7a in the Cherwell Local Plan Part 1 Partial Review. (LPP1PR). The principle of development here is accordingly established, and with it, key development parameters that are set in policy.

We are one of the two largest bus operators in the City and wider County. Since the start of 2022 Stagecoach is the only commercial bus operator in Kidlington and on the Banbury Road corridor in Oxford. Our S5 Oxford-Bicester service directly serves the frontage of the allocation.

Stagecoach participated actively in the preparation of the Cherwell Local Plan Part 1 and its Partial Review to identify land to meet housing needs arising within the City of Oxford, which could not be accommodated within its administrative area. We gave evidence to the Local Planning Authority and the County Council regarding the range of alternatives consulted upon. We strongly supported the approach taken by the LPA to seek to meet housing need as close as possible to where it arose, to form a compact pattern of development, which reduced the need to travel and took the fullest possible advantage of active travel and existing high-quality public transport services.

Allocation PR7a thus is exceptionally well located to minimise the use of the private car. It is nevertheless vital that the proposals for the allocation demonstrate that they have fully identified and secured the opportunities to maximise walking cycling and public transport use from the site.

2. The baseline bus service situation

There has been no pre-application discussion with Stagecoach regarding this scheme. Knowing both the applicant and their consultant reasonably well, this is rather disappointing.

Reading the Transport Assessment submitted in support of the application it is apparent from the content set out at section 3.18-3.20 that the work that was done to inform this was performed some time ago. The situation with bus services during the COVID crisis has been exceptionally fluid. Most recently Stagecoach has worked closely with Oxfordshire County Council and other commercial operators to ensure that a sustainable public transport offer is put in place for the immediate future, creating a secure basis on which to rebuild.

As a result of this, in January 2022, there was a major recast of services on the A4260 Oxford Road, and from in the Water Eaton area. Oxford Bus Company services have been entirely withdrawn from the locality, including their journeys on service 2, and service 500.

Stagecoach has altered and augmented its services to maintain provision as far as possible. Service 2 now runs every 10 minutes on the Oxford Road a little distance west of the site. Service 7 now enters the Park and Ride at Oxford Parkway serving it every 30 minutes, as well as maintaining the pre-existing service on the Oxford Road, extending to Oxford Airport and to Woodstock. Service 700 is also retained providing a link about every 30 minutes direct to the John Radcliffe Hospital and Churchill Hospital sites in Kidlington, as well as large scale employment in the wider Headington area.

Most important as far as these proposals and the allocation as a whole is concerned, the site is served directly by the premium S5 running between Oxford, Gosford and Bicester, which runs along the site frontage. The service is mentioned as a three times a day peak only service, which has never been true. It runs broadly every 15 minutes, with journeys operating from early in the morning to late at night. S5 would be by far the most relevant public transport choice from the site.

It is likely that some further alterations to the service offer will take place later in 2022, dependent on the rate and manner in which patronage continues to recover over the spring and summer. However, the broad shape of the network described above is anticipated to remain in place.

Bus stops on Bicester Road, near the Sainsbury's access at the southern end of the site, are marked on the Access Strategy, in a fairly broad brush way. There are no more stops until Gosford, some distance to the north, reflecting the fact that the existing urban edge of Kidlington at this point is impermeable and the adjoining development turns its back on this corridor.

The access strategy also marks bus stops on the A4260 Oxford Road in Kidlington, north and west of the Sainsbury's store, which are served by the frequent 2 and 700 services. These are some distance from the centre of the site and while they have some relevance, especially for journeys to and from Headington, it is likely to be greatly lesser than those existing and potential stop directly related to the site on Bicester Road.

We do not understand or recognise the "existing bus stops" marked at the back of Fairfax Centre, or on Cromwell Road in the Illustrative Development Framework. These do not exist on the ground.

3. Local Transport Plan 3, Oxford Transport Strategy and emerging transport policy.

The current transport policy position is established by LTP4, the Local Transport Plan to 2031 also known as "Connecting Oxfordshire", adopted in 2015. LTP4 was a key element of the evidence base that supported the Cherwell Local Plan Part 1 and its Partial Review.

Especially relevant to this application is the much more detailed set of proposals set out in the Oxford Transport Strategy. We refer back to these later in this response. These include a strong focus on public transport priority to key corridors approaching the city, including the A4260 through Kidlington feeding into the Banbury Road, and the A44 feeding Woodstock Road a short distance further west. These are the focus

for significant planned short term investments in the “North of Oxford Corridors” (NOC), beyond the Oxford Ring Road; and separate emerging proposals further south within the Ring Road on Banbury and Woodstock Roads.

The TA makes brief mention of a significant highways scheme at the Kidlington Roundabout. This is one of three components of the wider NOC strategy that is to be imminently implemented, and it should be completed before this application is determined. We are surprised that there is little attempt to elaborate on this project, though it is fair to say that some final detailed design amendments appear to have been in progress until recently. Among other things, this is intended to greatly improve active travel connectivity north to south through the roundabout, as well as enhance bus priority, including on the Bicester Road arm southbound. In so doing, buses directly serving the main site frontage will have near seamless bus priority to the Ring Road, as well as benefiting from existing bus priority into the city further south.

Further feasibility design work on major transformation of Banbury and Woodstock Roads to greatly elevate the level of service for sustainable modes has very recently paused. This is because focused work is underway to accelerate the definition of a package of measures to radically reduce vehicular traffic within the Ring Road, and in so doing, provide much greater scope to reallocate carriageway to active travel modes in particular. It will also transform the productivity and reliability of bus services – by at least 10% and potentially more on key corridors. This includes the B4495 corridor around the eastern suburbs of the City. One key link is the Marston Ferry Road from Summertown towards Headington. Modelling work is now underway to fully understand the potential impact of a mode filter on this link, as part of a comprehensive scheme across the whole city that also proposes a Workplace Parking Levy.

LTP4 is to be replaced by the Local Transport and Connectivity Plan reviewing the policy in the light of a range of urgent challenges, not least the need to accelerate the transition to net-zero carbon mobility. It roll forward the plan horizon to 2050. LTCP5 is anticipated to refresh as well as reaffirm many existing policy areas. For example, the approach to the Park and Ride offer is under review, within the context of the need to facilitate a much more comprehensive and integrated multi-modal transport offer across the full range of modes, including micro-mobility.

This naturally has direct relevance to Oxford Parkway. The former Water Eaton Park and Ride which lies alongside the station, was the last of five to open. It not has at least as much relevance in facilitating first and last mile access to the station and longer distance journeys, as to intercepting car-borne traffic heading to the city centre, as it was designed. It is also going to be a key interception point on greatly faster and more frequent bus services to the acute hospitals in Headington, and the wider employment in the Eastern Arc.

4. The Site Access Strategy

We find it rather hard to understand why the TA quotes long-superseded guidance on pedestrian and cycle infrastructure design at length while saying nothing about LTN01/20, its very clear governing principles, and the equally clear standards that flow out from that.

Walking and cycling infrastructure from the site must offer the highest level of service on direct and legible desire lines to key destinations and public transport nodes. As well as existing bus stops on Bicester Road, this includes the key pedestrian link along the northern edge of the Sainsbury’s site which is the only direct route leading into Kidlington, because of the permeability of the eastern existing edge to the built-area.

“4.20 To facilitate connections into Kidlington and the Park and Ride, crossing points are to be provided on Bicester Road to facilitate access towards the existing facility on the western side of Bicester Road. This

would improve pedestrian links between the site and Kidlington and provide safer pedestrian crossing opportunities along Bicester Road which bounds the entire western boundary of the site.”

The shared use cycle facility at the main vehicular access does not take a direct route across Bicester Road. The crossing facility does not appear to be able to accommodate a cycle within the central island, and there seems insufficient width for pedestrians and cycles to cross. It links to an existing shared use facility that is not on any clear desire line for either pedestrians or cycles. It may well be preferable to look at arrangements within the site and adjacent land that feed towards the north and north west, as the node at the existing Water Eaton Lane signals will be an important one for the allocation taken as a whole.

The link towards Oxford Parkway Station to the south is also recognised to be important in the material. However the rest of Paragraph 4.20 is entirely unclear as to what the measures to create direct pedestrian and cycle access directly to Oxford Road, Water Eaton, would actually be. Crossing Bicester Road is entirely irrelevant to providing links to the Park and Ride and, more importantly, Oxford Parkway Station. We actually wonder if the TA has been produced as an entirely desktop exercise and that the Sainsbury's car park has been mistaken as the Park and Ride site.

Rather, we would have expected a much greater emphasis on high-quality cycling links to Oxford Road, at the southern end of the land control in the material. This is the direct desire line to the station, as well as the Park and Ride Terminal, especially for links toward the Eastern Arc and the Hospitals, which already exist, but are expected to see very substantial improvement, especially after 2024 and the expected implementation of the wider Central Oxfordshire Transport Strategy, which is in the process of being fully defined by the County Council.

We see no evidence of segregated cycling provision anywhere within the material. This need not necessarily be along the primary streets within the development, though this might be seen as the most legible and appropriate solution. Irrespective, given the context and location, it makes sense to work hard to maximise the attractiveness of this mode – for example, to avoid the temptation for primary school children to be driven off-site to primary schools, all of which will lie outside of the development and the wider PR7a allocation.

Appendix D in the TA sets out the proposed access arrangements. Especially since vehicular access is not a reserved matter, these drawings show a minimal level of detail. This is even more true of pedestrian and cycle access which we can only assume - by inference - is not reserved and will form a part of reserved matters applications. This is an unusual approach to take, if so. The material refers to pedestrian and cycle links associated with the southern point of connection in particular, which is that which most closely relates to pedestrian and cycle desire lines across the Bicester Road into Kidlington. No evidence of pedestrian or cycle provision is provided of any kind, despite this.

The level of care and attention paid to bus stop infrastructure is equally scant. We naturally welcome the recognition that the existing bus stops on Bicester Road warrant an upgrade. However, there is no consideration of whether a second pair of stops is appropriate rather further north, that would much more immediately relate to the main part of the developed area, including the third party land to the north. This would be necessary to ensure that the whole of this site and the wider PR7a allocation is able to take advantage of the S5 service, which is both regular and direct, within walking distances of about 300m, which ought to be readily achievable. It also provides fast links to Bicester, directly serving major employment allocations and Bicester Village, as well as to Oxford.

5. Public transport enhancements

We have had no prior engagement with the applicant's consultant team prior to the submission of this application. Consequently, the contents can be considered to be entirely the product of their thinking.

The TA states at paragraph 4.22 *"A review of travel to work statistics confirms that 78.4% of public transport commuter trips generated adjacent to the site travel into Oxford. On that basis, it is reasonable to support public transport initiatives that respond to the likely travel patterns of the future residents. Therefore, subject to discussions with the relevant stakeholders, it is recommended to increase the S5 frequency during peak periods."* While Census 2011 is now very long in the tooth, the nature of the allocation and its justification to meet housing needs arising in the City, as well as a local knowledge of where Kidlington sits as a close satellite of the City, confirms that the broad premise that most demand will be heading into the City is entirely reasonable.

However, far from all the economic activity in the city is in the Central area. For many years, the Eastern Arc, including Headington, has been the locus of employment growth, led not only by the Hospitals, but Oxford Brookes University and the Oxford University Old Road Campus.

The site is immediately east of the proposed bus rapid transit corridor between Kidlington and the Eastern Arc, that is defined in the Oxford Transport Strategy that sits within the existing Local Transport Plan to 2031 "Connecting Oxfordshire". While the process of reviewing this is well advanced, there is no doubt that the broad shape of such an improved bus service provision will be carried forward in some form. Given that frequency and service coverage between the site and the City Centre is already at a very good level, whether on the Bicester Road or Oxford Road, it makes little sense to improve these frequencies with developer funding. While it is for the Local Transport and Highways Authority to ultimately confirm the approach that they wish to pursue, we would advise that we think it much more appropriate to direct a bus service enhancement budget to the less frequent and less well-established 700 corridor, in support of this established policy objective, and where a much higher level of mode shift is demonstrably achievable.

6. Conclusion

Stagecoach has consistently strongly supported the identification of this site as one of the most sustainable possible opportunity to meet housing need in and around the City of Oxford. We welcome the fact that this application signals that the delivery of the allocation is moving forward to help meet acute housing need. 50% of the homes will be affordable tenures and many of these will be for social rent.

However, far from substantiating in some depth the exceptional opportunities to leverage and enhance the use of sustainable modes to and from the site, the application material is exceptionally lacking in detail and substance. It fails to show how the development proposals can explicitly respond to these opportunities to secure the objectives of national policy, the County's current and emergent transport strategies, and the policies set out in the adopted Local Plan, which carry full weight and are highly material considerations in the planning balance. Where the Transport Assessment does make specific points and indicate certain infrastructure and services, too often it is inaccurate.

Read as a whole, we actually wonder if the submitted TA is actually a paper exercise designed to allow the application to be registered, rather than a seriously considered piece of work to inform the determination process at an appropriate level of detail. We understand that there may well be legal obligations binding on the applicant to submit a planning application within a fixed period after the adoption of the Local Plan allocating the site. If so, we understand the situation that applies. Even so, we still feel it is regrettable, as it

merely lead to advice having to be formally tabled in the public domain, that might have been better given pre-application on an informal basis. This is needlessly adversarial and time-consuming for all parties.

As always, we are very ready to engage positively and constructively with the LPA, the LTA/LHA and the applicant's team to address the points we have raised. In this regard, I look forward to hearing from any of the parties concerned in due course.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'N. Small', with a stylized flourish at the end.

Nick Small

Head of Strategic Development and the Built Environment