

August 18th 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,

22/02101/OUT Banbury, Land East of Withycombe Farm - Stagecoach Observations**1. Introductory Comments**

I am writing on behalf of Stagecoach West to offer our observations and additional information regarding the development proposals referenced above.

We are one of the two largest bus operators wider County and overwhelmingly the main operator in Cherwell District. Stagecoach runs the vast majority of bus services in and around Banbury, including the main town bus network, and inter-urban routes to towns beyond. The company takes seriously its responsibility to fully and constructively participate in plan-making and development management processes to support the achievement of sustainable development. This responsibility has regard to the statements at paragraphs 15 and 16 of the National Planning Policy Framework (NPPF). In particular we are concerned that patterns of development and proposals take full account of the opportunities for sustainable transport, and do not lead to outcomes that reinforce car-dependency, and aggravate the deleterious consequences of excessive car use.

We are especially concerned that high levels of car dependency do not further erode the efficiency, reliability and relevance of bus services as a result of rising traffic congestion. Banbury itself suffers very seriously from increasing congestion, and this has had the direct effect of undermining the operation of several services in Banbury since 2013. The most direct casualty of this was town service B1 to Easington, where the inability to reliably sustain a half-hourly frequency directly led to marked passenger decline on an irregularly scheduled but more reliably operable service. We have been stressing to the County Council for a considerable period that short-term action is now necessary to avoid a much more general and substantial retrenchment of the Banbury bus offer, which has been financially marginal for many years. This need is now acute.

However, the potential relevance of bus service in the town could be much more significant, and offer real choices to car use. The town has an extremely high level of self-containment compared with almost any other in the County. Daily journey lengths are well within that that makes a bus journey a realistically

competitive prospect given a suitable timetable frequency and efficient operation, together with a reasonably swift journey time. Stagecoach has worked hard in partnership with the County Council to make the bus offer in Banbury much more relevant and attractive including:

- Linking key routes across the town centre to provide direct links to the main employment sites across the town centre, and offering easy connections in the town centre where a change is required in particular to and from Bretch Hill service B5;
- Greatly improved frequencies on service B9,
- Timely extension of routes to serve new developments
- Greatly improved evening and Sunday services

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.

We are aware that at present Cherwell District Council cannot demonstrate a 5 year supply of deliverable housing sites. The most recent assessment of the position on the five year housing land supply within the District is the Council's own 2021 Annual Monitoring Report. This states the Council can demonstrate a 3.5 year supply of housing for the period 2022-2027. Therefore the tilted balance, under Paragraph 11 of the NPPF, is engaged. It follows that planning permission should be granted unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against policies in the NPPF taken as a whole.

This shortfall is at a level that can only be considered a significant deficit, and very significant weight in the planning balance is typically given to proposals that can address this level of deficit in the short term. We are well aware of proposals elsewhere in the District, justified by the tilted balance, that do not in any way present realistic choices to travel, and are clearly overwhelmingly car-dependent, typically in villages. A very good example is at Fritwell (21/03066/OUT), and another at Finmere (22/01807/OUT). A substantial proposal for 150 dwellings South Green Lane, Chesterton, is imminent. None of these villages have ever sustained public transport services sufficiently regular to be a broadly relevant choice. Active travel is not a realistic choice either, to take advantage of opportunities and satisfy needs that can only be met outside the village. Nor is a wide range of services, or employment available in these settlements. Not only are the resultant car journeys energy and carbon intense, they disproportionately put pressure on already saturated highway junctions and links across a broad area, contributing directly to making public transport less reliable, more costly to operate, and less effective.

It is thus vital that in addressing the short-term deficit in housing land supply, sites are brought forward that do demonstrably align with a sustainable pattern of development, where active travel and public transport can play the fullest possible role, and where the need to make long motorised journeys is minimised.

Stagecoach considers that this proposals stands out as being one such opportunity.

2. The location of the development

The proposals concern land parcels that lie immediately to the south of allocation BAN3 in the Cherwell Local Plan Part 1 now being built out, and well advanced by the applicant.

The principle of development here being fundamentally sustainable has accordingly been established, at the point that the adopted Local Plan 2031 was prepared and independently tested. This has been reaffirmed rather more recently through two much more recent determinations on land immediately to the south, (20/01643/OUT determined by appeal and 21/03644/OUT determined by the Council) which were, like this site, advanced as departures to the statutory adopted development plan. This site lies between these consents and the BAN3 allocation to the north.

Notably, the Local Plan maintains a spatial strategy that focuses the majority of development in and adjacent to the two main settlements of Banbury and Bicester. These proposals clearly are entirely congruent with that spatial pattern.

We note that delivery of the development in and around Banbury has progressed with considerable and sustained momentum. As a result, all but one of the remaining strategic allocations have progressed towards delivery in recent years, to the point that reserved matters have now been submitted on two of the largest opportunities remaining within the Local Plan Part 1 at Land South of Salt Way (BAN17) and at Drayton Lodge (BAN18). It is quite a sound surmise, then, that to bring further land forward in Banbury is in line with both market demands, and the potential to deliver quickly to meet the district-wide shortfall. We note that an early consent would allow the applicant to seamlessly sequence delivery behind the BAN3 development, known as Banbury Rise, to the north, with no break in the process. Given the urgent need to backfill the 5-year supply we consider this materially further weighs in favour of this proposal.

The site represents a logical rounding-out and consolidation of the built form, within 2km of the town centre. It thus represents a compact form of development, however that is understood, in one of the two most sustainable settlements in the District.

3. Access to public transport from the development

The Planning Statement and the Transport Assessment highlight the high degree of pedestrian and cycle permeability across the eastern edge of the site towards the established neighbourhood of Bretch Hill. Three established rights of way cross the site from west to east, one on the northern edge leading to Dover Avenue, one on the southern edge leading to Bretch Hill, and one in between these along the existing hedgeline leading to Balmoral Avenue. A fourth opportunity lies towards the north east corner of the site that would connect a little further south into Dover Avenue. All these links provide logical and legible walking routes to stops on the Stagecoach B5 service, which runs along Bretch Hill.

Subject to suitable lit paved facilities being provided, this would place the whole development within a 400m walk of this service.

B5 operates from 0600-2000 Monday-Saturday operating every 15 minutes during the day. On Sunday the service operates every 20 minutes. This is a relatively frequent service running seven days a week. Journeys are times to allow direct connection every 30 minutes to service B9 towards Banbury Gateway and employment at Ermont Way and Wildmere. There is scope to improve the later evening service and to provide a direct link to the east of Banbury without the need to change buses every 30 minutes.

The route runs in a large clockwise loop around Bretch Hill. This is not ideal, but somewhat extended journey times to town are compensated for in part by rather more direct ones on the return. It is worth noting too, that car traffic from the development will itself have to continue some distance to the north to access the wider highway network via Edinburgh Road. Residents walking off-site to the bus stops will in a good many instances have a more direct and logical route to follow than vehicular traffic.

These pedestrian and cycle links will clearly help facilitate a good level of active travel connectivity to local facilities and services. Local topography mitigates somewhat against the use of pushbikes, but electric bikes overcome a great deal of this problem. The site is quite advantageously located with regard to several secondary schools and the Activate Learning FE Campus in Banbury.

4. Conclusion

In line with the discussion above, Stagecoach concludes that the proposal is one of the best likely to come before the Council to address the shortfall in housing supply over the next five years. Certainly, reading the policies in NPPF and the adopted Local Plan that are relevant in this case, and those related to sustainable transport and carbon mitigation in particular, this site well conforms to securing the strategic objectives of policy. This is especially important given the need to meet housing need in places where the use of sustainable modes can be maximised, and high dependency on long car-borne journeys can be minimised.

Stagecoach thus supports the application.

I trust that the foregoing is of assistance as you determine this application. Do not hesitate to contact me to discuss any of the matters raised should you consider it necessary.

Yours sincerely



Nick Small

Head of Strategic Development and the Built Environment