

April 13th 2023

By e-mail only:

Linda Griffiths
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Place and Growth Directorate
Cherwell District Council
Bodicote House
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BANBURY
OX15 4AA

Dear Linda,

23/00853/OUT, Land East of Warwick Road, Banbury**1. Background**

Thank you for apprising us of the application referred to above. As you know we have long had a keen interest in ensuring that sustainable development is achieved, supported by credible sustainable travel choices, and relevant and effective bus services in particular. I am happy to set out Stagecoach West's position in this case.

We recognise that this is a site that has been brought forward without the benefit of an allocation in any part of the existing adopted statutory development plan. That said, the existing elements of the plan are clearly now over 5 years old and portions of the policy suite are a great deal older than that. Furthermore, it is evident that significant elements of the adopted development strategy, principally at Bicester, are not coming forward. Nor is it evident that this situation will resolve itself soon. As our response to the recent Bloor submission on land South of Withycombe Farm 22/02101/OUT dated 18th August 2022 makes plain, Stagecoach is concerned that where additional land is brought forward to address the ongoing urgent development needs of the District, this takes place on sites that offer a credibly attractive choice of modes.

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.

Notwithstanding the changes that have taken place since Summer 2022, where the Council has brought forward a selection of departure sites, it is our view that at present Cherwell District Council remains vulnerable in its ability to securely demonstrate a 5 year supply of deliverable housing sites.

The Council's own 2021 Annual Monitoring Report stated in 2021 that the Council can demonstrate a 3.5 year supply of housing for the period 2022-2027. While this may have significantly improved since we note that the Council is reliant on a substantial amount of supply in its latest monitoring report where the certainty of delivery within 5 years is quite arguable. The engagement of the tilted balance, under Paragraph 11 of the NPPF, might be arguable. Irrespective, given what is known, it makes good sense to look favourably on sites where housing supply could be achieved within 5 years, in places where the full range of adverse effects can be minimised and the contribution of sustainable modes credibly maximised, rather than have the matter determined at appeal.

It remains the case that proposals exist 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 including Finmere, Fritwell and Shenington. A very good example is a substantial proposal for 147 dwellings South Green Lane, Chesterton (23/00173/OUT). 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.

in the interests, in the first instance of damping the impacts of traffic arising from the development on the wider local network, especially at key junctions in and around central Banbury, where our services are now prone to serious delay and unreliability. Obviously, looking more broadly, this is also essential to reducing

the energy and carbon intensity of mobility; and supporting wider policy objectives including healthier lifestyles and social inclusion.

2. The Principle of Development

The proposals concern land parcels that lie immediately to the north of allocation BAN5 in the Cherwell Local Plan Part 1 which are now all but entirely build complete. A short distance to the south west is the allocation BAN18 which we note is under the control of the same developer, and where construction is now about to commence, 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 a much more recent determination on a relatively short distance to the east (21/03426/OUT determined by the Council) which were, like this site, advanced as a departure to the statutory adopted development plan. This site lies between these consents and the BAN5 and BAN18 allocations.

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 alongside, possibly under the Linden Homes or Countryside Properties brands; or alternatively immediately after behind the BAN18 development, with no break in the process.

The site represents a consolidation of the built form, within 3km of the town centre. It thus represents a relatively compact form of development, adjoining one of the two most sustainable settlements in the District.

3. Master Planning and sustainable accessibility

Notwithstanding the above points, not all iterative extensions to larger settlements are necessarily well integrated into the adjoining built form; nor do they necessarily present the potential for a credible public transport offer. This is often true where sites adjoin previous recent development that was intended to represent the ultimate edge of the settlement. The northern edge of existing development is well landscaped and was indeed intended to form the enduring northern limit of the town in this area.

For this reason, the ability to integrate the additional development proposed with BAN5 to the south, and the Local Centre at Drayton Manor to the south west, is evidently of the essence. We note that the applicant recognises exactly this imperative, as stated in the submitted Transport Assessment:

“8.4.5 It is proposed to provide pedestrian facilities throughout the site to enhance permeability and connect directly to the existing pedestrian network on Warwick Road. The proposals comprise the provision of a 3.0m shared use route connecting the site access with the existing shared use route to the south of the site

and which follows on to the local pedestrian network in Banbury. It is also proposed to improve connections along the Public Rights of Way that cross the site and connect to Dukes Meadow Drive and to the 'Land Off Warwick Road North Of Hanwell Fields' development."

This is still the more important since the B9 bus service operated by Stagecoach, has always been intended to run through the BAN5 allocation, following the line of Nickling Road, on which two bus stops ought shortly to be installed, the westernmost of these planned just east of the Warwick Road junction. This is very close to where the upgraded Public Right of Way from the site will intersect with the bus route. Further east a second stop will relate quite closely to the second main pedestrian link running south from the south east corner of the developable area. These direct and intuitively legible pedestrian routes will thus feed residents directly to a frequent bus service operating 7 days per week, and well into the evening. A careful examination leads to the conclusion that the bulk of residents on these proposals will be within a 400m walk of these stops.

It is regrettable that the development phasing within BAN5 to the south has meant that to date, the road has not been completed to allow buses to operate as planned, until after the final occupations. We nevertheless expect this to be resolved in the short term. Where this proposal is concerned then, it can at least be said, positively, that bus services will be available from the first occupation at proper bus stops within convenient reach of dwellings.

We note that the wider strategy includes pedestrian and cycle connectivity that feeds into logical and direct links to key local facilities, including the North Oxfordshire Academy.

4. Conclusion

In line with the discussion above, Stagecoach concludes that the proposal is one that can be considered to address any current or potential shortfall in housing supply over the next five years in a manner where sustainable travel choices are reasonably good. It also broadly accords with the adopted development strategy for the District which seeks to concentrate development around Banbury and Bicester as the largest settlements.

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 sufficiently conforms to securing the strategic objectives of policy, subject to pedestrian and cycling permeability to the south west and south being secured, as the applicant recognises. 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.

I trust that the foregoing is of assistance as you determine this application.

Yours sincerely



Nick Small

Head of Strategic Development and the Built Environment