

14<sup>th</sup> June 2023

Paul Seckington / Linda Griffiths  
Principal Planning Officers - Major Developments Team  
Place and Growth Directorate  
Cherwell District Council  
Bodicote House  
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BANBURY  
OXON  
OX15 4AA

Dear Paul and Linda;

**23/01233/OUT, Strategic Allocation PR6a, Land East of Pipal Cottage,  
Oxford Road, Water Eaton**

I write on behalf of the Oxford Bus Company to set out our appraisal of the formal planning application referenced above.

As you are aware, Oxfordshire's commercial bus operators actively participated in the preparation of the Cherwell Local Plan Part 1 and its Partial Review, which sought to identify land to meet housing needs arising within the City of Oxford, which could not be accommodated within its administrative area. Evidence was supplied to the Local Planning Authority and the County Council regarding the range of spatial alternatives consulted upon to meet these needs sustainably.

In particular commercial bus operators strongly supported the approach taken by the LPA to seek to address Oxford's housing needs as close as possible to City, 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. This approach underpins the principle of development established in the Cherwell Local Plan Part 1 Partial Review by the release of the land on which these proposals lie from the Oxfordshire Green Belt, and its allocation as site PR6a. As highlighted in the Transport Assessment (TA) accompanying the proposals, the proposed development thus lies immediately adjacent to the existing edge of the city to the immediate east of the Oxford Road, this being a strategic bus service corridor. As well as very frequent services into the city centre, frequent longer distance services

operated by Stagecoach run towards the north to Woodstock and Bicester in particular, and also to Banbury.

Oxford Bus Company is shortly to assume operation of the established service 700 that also passes the site that provides a direct link from Kidlington past the site to the Headington area, including the large-scale employment and medical facilities at John Radcliffe and Churchill Hospitals, Oxford Brookes University, Oxford University's Old Road Campus in particular. This facility is especially important in providing relevant mobility options for the large and growing concentration of employment and services in this area, which lies somewhat beyond comfortable cycling distances, and where topography also acts as a further deterrent.

The Master and Fellows of Christ Church as landowner, and the developer's client team, have undertaken one of the most comprehensive and diligent pre-application engagement exercises with stakeholders and the public that we can recall in our experience. As a result, Oxford Bus Company and Stagecoach have been able to offer a significant amount of input in shaping the access and public transport strategy for these proposals. This has also had regard for a unified approach that also considers allocation PR6b lying west of Oxford Road, and which, as far as the strategic bus corridor is concerned, in effect needs to be designed to function properly as a unity.

Having looked at the suite of documents submitted in support of the application, including the Indicative Master Plan, the Parameters Plans, the TA and a number of specific highways General Arrangements, it is clear that this input has been positively considered and incorporated into these proposals. We recognise that the County Council as Local Highways Authority, as well as other transport stakeholders including CyclOx, have naturally had a very great influence in shaping the current proposals.

We consider and confirm for the benefit of the Council and other stakeholders the key principles that relate to public transport movements along the existing Oxford Road corridor and the way in which the proposals make best use of the existing services. In particular, the interface between the development and the Oxford Road is of the utmost importance. Among the proposals there is an important matter related to the existing bus stops providing interchange between bus and rail in the immediate vicinity of Oxford Parkway Station, where the current infrastructure is clearly compromised arising from current constraints.

### **Master Planning**

We consider that the approach to Master Planning is a well-considered and sophisticated response to the opportunities and constraints presented by the site.

The extent of the built form is compact, and it all lies well within 400m of the Oxford Road – a convenient walk - thus it is entirely right that residents walk toward the existing route to the west, especially given that this is a high

frequency corridor and one that accommodates services many of which perform a longer distance function. Even the principal local service 2/2A, and service 700, run to and from Kidlington to the north and diverting even this into the development would no doubt reflect unwarranted diversion and delay for a larger number of existing users with destinations to the north and south. Moreover, land to the west forming Allocation PR6b reflects a strategic planning approach that “hangs” development either side of the existing corridor.

This principle is reinforced by the creation of one major and two minor nodes where east-west access intersects the Oxford Road corridor.

The Local Centre accordingly addresses the corridor, which entirely rightly and very importantly, reinforces the principle that the intersection of key pedestrian and cycle nodes with high quality public transport should support the creation of key interchange points. Notably, and in our view thoughtfully, the Local Centre is sited not at the main vehicular access point, but somewhat further north at the secondary node where a major active travel corridor crosses the bus route. This maximises the centrality of the facility for both PR6a and PR6b residents, while avoiding creating further intensity of conflict with motorised traffic and their turning movements. Here, change of mode is supported by the provision of range of local services and facilities that support daily needs and help facilitate linked trip purposes that fulfil a variety of needs: so-called “chain journeys”. This is essential to maximise the convenience and relevance of sustainable modes, in pursuit of national and local policy objectives.

### **Access and movement**

We note and welcome the submission of a synoptic plan ITB16565 – 044A that demonstrates the conjoined approach taken to the corridor and both these PR6a proposals, and those emerging on PR6b has been submitted with the application. Those proposals on the western, northbound side of Oxford Road lie beyond the red-line and thus outwith the scope of the current application and will be separately progressed by that promoter/developer.

The access strategy seeks to minimise the number of junctions on the Oxford Road. A single all movements junction is proposed that is shared with PR6b to form a single new signalised crossroads. A secondary vehicular access to the north is provided for by a left-in left-out facility. As such this major development introduces only one new set of traffic signals, which serves to avoid increasing bus journey times on the corridor as a whole. This is very welcome and supported.

The northern access node is supported by a signalised TOUCAN crossing just south of the Local Centre site. Bus stops are sited immediately downstream of the crossing. This is best practice. The way that the area has been treated is especially thoughtful. The arrangement proposed means that residents wishing to use the facility either en-route to or from the bus stops on foot or cycle need not interact with local traffic at the junction. This kind of attention to detail is rare, but it strongly supports maximising the contribution of active travel and

public transport as the overall journey experience is made as safe, pleasant and seamless as possible. We commend this level of care.

A second pair of bus stops is provided for to the south at broadly the existing sites, that lie immediately south of the development frontage. These lie within the scope of proposals being advanced by Croudace Homes at Frideswide Farm within the City of Oxford. The distance between the proposed new stops and these is somewhat higher than would typically be expected. However, in view of the character of the road, the proposed vehicular junctions, and the way that the urban form has been designed relating directly to key pedestrian crossings, the approach taken here is certainly the correct one. It is important to recognise that the arrangement proposed keeps bus stops away from the intense activity surrounding the main signalised crossroads and CYCLOPS junction. Finally it avoids a proliferation of stops and associated delay for through bus movements.

Accordingly, we support and strongly endorse the approach proposed.

The proposals seek to provide for the strategic improvement of pedestrian and cycling infrastructure on the Oxford Road. This ties seamlessly into separate proposals at Frideswide Farm to the south. The applicant's willingness to sacrifice a strip of land on the western boundary to facilitate this is not immediately apparent from the submitted drawings. In so doing the current constraint presented by publicly maintainable highway is overcome. A 2.5m wide LTN01/20-compliant southbound cycle track is accordingly proposed the length of the frontage physically offset from the carriageway (here, a bus lane) by a 3m verge. This allows ample space for a bus stop island to be provided, obviating conflict between waiting, boarding and alighting bus passengers. The boarder could accommodate a high-quality shelter and other relevant equipment such as Real-Time Passenger Information displays. We urge that these are provided. The continuation of pedestrian and cycle permeability to the south west boundary of the proposals through the Croudace Homes site presents direct and highly legible pedestrian access to the bus stops.

Accordingly, a very high level of service is provided to all sustainable mode users without compromise. This, again, represents best practice, and we are happy to both support and unequivocally endorse the approach taken.

The parameter plans also demonstrate planned provision of a parallel north-south cycling route through the middle of the development. This will offer a much more relaxed and quiet cycling environment as well as offering more direct routes to a number of likely local destinations that lie to the south of the site and east of the bus corridor. This can be expected to substantially boost the relevance of active travel and alongside the exceptional public transport offer. This ought to very greatly attenuate the demand for car-borne trips to and from the site. It also spreads cycling demand in such a way that the existing cycling corridor along the wider A4165, which is separately to be greatly improved, functions well without undue pressure. This is especially important since the interface between bus stops and cycle tracks is inherently challenging to manage in such a way that the best possible level of service is provided to

cyclists and other “wheelers” without detriment to pedestrians and bus passengers.

### **The offsite Oxford Road Corridor to the north.**

We note the submission of Drawing ITB16565 – SK 073A with the application. This relates to the length of road between the Kidlington Roundabout and the existing Water Eaton (Oxford Parkway) Park and Ride junction. Much of this stretch is carried on bridge structures across the A34 Trunk Road and the Oxford-Bicester- Bletchley Rail Line, and the substantial embankments required to effect these crossings. Both the bridge decks and the embankments are of restricted width.

These drawings apparently reflect discussions between the applicants and promoters of the application and the PR6b site, and Oxfordshire County Council, about the County’s aspirations for the treatment of this key link. Quite apart from the existing settlement of Kidlington to the north, the route directly serves LPPRPt1 allocations PR7a and PR8 immediately north of the A34. We recognise that policy strongly supports the improvement of active travel links along this route, which represents a key constriction in the otherwise seamless provision of segregated cycling infrastructure in the corridor.

A southbound bus lane is provided from south of the Kidlington Roundabout along this stretch. This is long established, and it is used by up to 18 buses per hour, providing over 1200 peak southbound seats per hour. The corridor is itself designated a “Bus Rapid Transit” corridor within the Local Transport Plan intended to support, among other things, substantial mode shift to bus for longer local and inter-urban journeys; and in particular to create a new high frequency link between Woodstock and Bladon, including strategic development allocated in West Oxfordshire, Oxford Airport, Kidlington and the Oxford Eastern Arc. The existing service 700 forms a core element around which this service offer will be built.

We recognise that the drawing is for information and does not form any part of the application submitted for determination by the Local Planning Authority.

Nevertheless, at this stage, given that these proposals are now in the public domain, it is important that public sectors stakeholders are advised, and record as follows:

- We have had no prior engagement or notification of these proposals nor had any discussions surrounding them.
- Accordingly, the detailed justification for them, having regard to securing the County Council’s policy objectives in the round, is not something we have been party to, and are otherwise opaque.
- The technical details supplied involve a 6m residual vehicular carriageway. This is too narrow to allow two large vehicles, such as lorries or buses to pass, at 30mph. The intensity of traffic along this road is such that this can be envisaged to occur frequently. There are, additionally, potential implications for the appropriately safe operation of

the northbound and southbound proposed with flow segregated cycle provision alongside the carriageway.

- We note and welcome that the current bus stops serving Oxford Parkway Station are to be relocated and upgraded to effect better bus-rail connectivity.
- The removal of the current southbound bus lane is not something we have discussed nor is it something we can at this stage agree can be achieved without detriment to bus journey times, based on evidence we have before us. The drawing states the bus lane is “underused”. This language is wholly inaccurate, when the frequency and capacity of buses on the corridor is considered. Furthermore, the Council intends bus frequency, capacity and connectivity should increase, in support of its own policy goals. Given current and forecast levels of queueing and delay along this stretch, we could consider whether the current bus lane provision is, in fact, the most appropriate use of road space. However, the County Council is bound both by the Statutory Enhanced Partnership and by the conditions attached to DfT grant funding under the ZEBRA competition to support the replacement of the entire bus fleet operating wholly within the City of Oxford and its immediate surroundings, to secure, at a minimum, a 10% improvement of average bus journey times. Thus far the County Council has delivered no additional bus priority measures within the City, and has, rather taken steps that have greatly diminished bus reliability and journey time. Accordingly, we would soberly counsel the Highway Authority that they should progress any proposals collaboratively with all stakeholders including ourselves, and with very great care, supported by a proper evidential basis.
- Linked with the above, the reduction of the speed limit from 40 to 30 mph along this significant stretch, including along the development frontage, is hardly likely to support greater bus productivity along the corridor. Given the existing and proposed character of the route, we do concede that this is nevertheless probably appropriate, and subject to free-flow conditions for buses being maintained at all times, it is likely to have relatively little practical impact.

We strongly urge the County council to discuss these proposals with us, and are disappointed and dismayed that we have had no prior knowledge or discussion of them.

### **Concluding comments**

Oxford Bus Company is happy to record its unequivocal support for these proposals. On a scheme of this scale and complexity, we find that we can do this only exceptionally rarely. Indeed, we can not identify any area of material concern, or grounds for improvement. This rare indeed, and we trust that our own conclusions will be reinforced by that from many other stakeholders.

Housing need within the City of Oxford is, of course, acute. The principle of development here is long established, and the detailed site-specific policies likewise. We consider that the proposals comply with policies in all respects regarding transport and accessibility. To secure this important contribution to

the City's housing needs propitiously, we therefore trust that the Local Planning Authority accordingly will approve the application without delay, all other matters being satisfactory, in line with the requirements set out in the National planning Policy Framework at Paragraph 11, pursuant also to Section 38(6) of the Planning and Compulsory Purchase Act 2004.

Yours sincerely



Nick Small

Head of Built Environment and Infrastructure