Thames Travel

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BY EMAIL

Dear Andy,

Planning Application 18/00825/HYBRID Heyford Park

This letter represents a formal response by the City of Oxford Motor Services Ltd. (T/A Oxford Bus Company), Thames Travel (Wallingford) Ltd. and Carousel Buses Ltd.

Thames Travel would like to **COMMENT** on the above proposal.

The Transport Assessment accompanying the application (Environmental Statement Part 6) sets out the proposals for improving bus services to/from the site:

> *"6.6.19 The assessment parameters set out proposals to split the existing 25A service into 2 new services; one between Heyford Park and Bicester via Bicester Village Station; and, one between Heyford Park and Oxford via Oxford Parkway Station, subject to the emerging Public Transport Strategy (PTS) for Heyford Park.*
>
> *6.6.20 The Heyford Park to Bicester service will provide for a service operating up to a 15 minute frequency Mondays – Saturdays and an hourly service on Sundays, subject to the emerging PTS.*
>
> *6.6.21 The Heyford Park to Oxford service will provide an hourly service Mondays – Fridays."*

Thames Travel operate the existing 250 (formerly the 25A) bus service from Bicester to Oxford via Upper Heyford and therefore we are in a good position to advise on the deliverability of the bus service enhancements that are proposed to mitigate traffic generated by the development.

A S106 contribution would be needed to pump-prime the service up until a point which it is likely to become commercially viable which could be substantial given that the current 250 route is financially challenging. The bus services from Heyford Park to

Oxford and Bicester (if the new routes followed the current 250 route) would be indirect along country roads passing limited built up areas to further support the services.

From our experience as a bus operator in this locality it is likely that it will take near to 10 years for the new bus services to Heyford Park to become commercially viable. The splitting of the routes and the increase in frequency to Bicester will result in the need for 5 additional buses to deliver this service. The S106 would ideally be paid starting with a full-cost year one at then declining incrementally over the following 10 years.

I understand that a Bus Service Strategy Technical Note was produced by PBA in July 2016 which tested an increased frequency of the 25A (250) on its current route of every 30 mins and every 20 mins Mon-Sat daytime and concluded that both options would be commercially viable once all the development was occupied.

However, I am not aware that there has been a similar exercise undertaken for this current proposal of splitting the route with a potential daytime frequency of every 15 minutes to Bicester. If it has not already been done then I would urge that it is so that the level of S106 contribution, and the timescale across which it is delivered can be determined.

With regards to the timing of the S106, it is unclear whether the S106 contribution would mitigate against the 1,175 dwellings in this application or mitigate against the full 1,600 dwellings remaining in the allocation of the site (the TA states that it is assessing the full 1,600 dwellings). It is important to understand whether there would be additional S106 contributions from further applications or whether this application will deliver the full amount required.

To achieve the level of bus service proposed, and to maintain it for 10 years, will be a significant cost to the development and it is hoped that the applicant considered this cost from the outset when purchasing the site and that the Council were alert to this significant infrastructure cost when allocating the site for residential development. Otherwise, there is a risk that the site will not be able to afford all the S106 mitigation measures that are required to make the development acceptable in planning terms and thereby delaying delivery.

The Local Plan Inspector for the Upper Heyford site singled out the need for improved public transport, specifically bus services, to mitigate against traffic impacts. The report stated, *"available [road network] capacity could be increased to cope satisfactorily with the likely increased traffic generation…Even so, these conclusions are based on the reasonable but challenging assumption that the use of non-car travel modes, especially public transport and here that effectively means bus services, can be materially improved."* (paragraphs 226 and 227, Local Plan Part 1 Inspector's Report, May 2015) and Main Modification 154 reflected this. I understand that at the Local Plan EiP, a substantial investment in public transport was seen as key to making the quantum of development acceptable.

The S106 towards public transport provision is therefore critical to the determination of this application.

Unfortunately, it is common in many Local Plans to allocate housing sites by placing too much emphasis on the fact that a site is brownfield. Brownfield sites, such as the former airfields of Oxfordshire, are not necessarily inherently sustainable. In fact, they can be very unsustainable if the site is in the middle of a rural area with a poor transport network requiring a huge financial contribution to run a new bus service. Plan makers need to become more alert to this problem and challenge developers at an earlier stage (and talk to bus operators) so that they are fully aware of likely infrastructure challenges on sites.

I hope my comments are useful and I am happy to assist further on this matter.

Yours sincerely,

Laura Higgins
Strategic Development Manager
Oxford Bus Company, Thames Travel and Carousel Buses