

Vale of White Horse Local Plan Part 2

Regulation 19 (Submission) Consultation

Response on behalf of Stagecoach in Oxfordshire and Stagecoach West

PART A Personal details

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PART B REPRESENTATIONS

1. Introduction

Stagecoach is one of the two commercial operators of bus services in the Vale of White Horse. These services are run by two operating divisions: Stagecoach West, serving the Western Vale, and the A420 corridor in particular; and Stagecoach in Oxfordshire, with current operations in the district serving the corridors between Oxford, Abingdon, Grove and Wantage. Stagecoach in Oxfordshire also serves the Harwell Campus daily with a link direct to and from Oxford.

Stagecoach welcomes the opportunity to comment on the elements comprising the proposed Statutory Development Plan for the Vale, comprising the Local Plan Part 2 (LPP2). These comments relate to the emergent plan proposed for submission, and our previous comments made to Local Plan Part 1 (LPP1, now adopted) largely remain valid. Reference to these may help participants better understand the factors that would support the most sustainable possible pattern of development as far as the access to and availability of public transport is concerned.

These representations on behalf of Stagecoach West and Stagecoach in Oxfordshire, are prepared with sole regard to the matters set out in paragraph 182 of the National Planning Policy Framework against which policy in the submission draft Plan must be evaluated, namely:

- **Has the plan been positively prepared** – will the plan meet development needs and infrastructure requirements and is it consistent with achieving sustainable development?
- **Is the plan justified** – is the plan based on a robust and credible evidence base?
- **Is the plan effective** – can the plan actually be delivered and is it able to respond to change?
- **Is the plan consistent with national policy** – is the plan consistent with the National Planning Policy Framework (NPPF)?

2. Evidence Base

2.1. Strategic Environmental Appraisal

To be legally compliant with national and European law regarding Environmental Appraisal, and reflected in conformity with NPPF paragraph 182, the evidence base for the Plan should be robust and proportionate, and ensure that all reasonable alternatives are both properly considered and appraised to ensure that the selected development strategy is the most appropriate. This in turn demands that the basis for such appraisal is both accurate and consistent.

Stagecoach considers that in certain important respects, the evidence on the existing and potential public transport serving the sites under appraisal is inaccurate; and the approach then taken to selecting and discarding alternatives is inconsistent and lacking sufficient robustness.

In particular, we note from the appraisal summary tables that North West Grove is selected on the basis that the site is served by an hourly bus service. This is not the case. Indeed the site is currently accessed off a single track road (Denchworth Road) that examination on site (on on Google Streetview) would demonstrate is not fit for use by large vehicles, and certainly cannot safely accommodate a regular bus service. The site is not served by public transport at all. Indeed it is most

unlikely that any bus service can be provided to or through this proposed allocation until the North West Grove Link Road is open to traffic if not entirely complete.

We also note that Dalton Barracks is selected based on the fact it is served currently by a half-hourly bus services. This again is not correct in that only one bus per hour of the two in the corridor currently serves the site. In this instance we do recognise that it is likely to be possible and may well prove to be both appropriate to divert both services to the site.

It is probably more appropriate and logical for the site appraisal process to focus rather more on the potential for candidate sites to either provide improved public transport, or benefit directly from such improvements as are credibly foreseeable. This information is supplied within the County Councils' Science Vale Transport Strategy. With regards to public transport provision, a specific section outlines the anticipated means by which public transport service improvements will be provided to secure the Strategy's objectives, in support of LPP1 and LPP2.

While the exact timing and phasing of such improvements can only be indicative, and may be subject to some adjustments in the light of events, it should be very apparent that the A338 between Grove Green and East Hanney is anticipated to benefit from as many as 8 buses/hour (BPH) by the end of the Plan period, and certainly 6 BPH at peak times is a figure that we would regard as a reasonable assumption within the period to 2026. The SVTS indicates NW grove will benefit from rather fewer: most likely, just 2 BPH. We would suggest that the best case scenario for the corridor along the proposed North West Grove Link Road would be 3 BPH at peak times: less than half that level likely to be offered at the A338 north of Grove.

The dismissal of the omission site East of the A338 at Grove, and also certain options at East Hanney, is thus a very real concern, as they represent highly sustainable options that has been ruled out of the Plan based on inappropriate and inaccurate evidence.

We would thus suggest in this regard the Submission Plan is not legally compliant and is unsound on the basis that it is not robustly and appropriately justified.

2.2. The Housing trajectory

Stagecoach is particularly concerned that the Plan is deliverable and achievable, as required by NPPF at paragraph 77. The result of a Plan that is unable to securely deliver housing against the objectively-assessed housing needs for the District, is that promotions are brought forward in locations that, in the vast majority of instances, are either poorly served by public transport, or not served at all. This results in an inherently car-dependent form of development that disproportionately contributes to traffic generation, and congestion, not just within the District but on key corridors and at key junctions just beyond it: on the approaches to Swindon and Oxford in particular.

Stagecoach is aware from the recent appeal decision at East Hendred¹ that the District cannot securely demonstrate a 5 year housing land supply within the Science Vale "ring fence" area, though it can for the District as a whole. While we note that the view was taken that the latter fact was a

¹ Appeal reference: APP/V3120/W/16/3145234 Mather House & Greensands, White Road and Reading Road, East Hendred, Wantage OX12 8JE

more important one when regard was had to the engagement of paragraph 49, and the “tilted balance” within NPPF at paragraph 14 applying to decision taking in such circumstances, that appeal was, nevertheless, allowed.

Irrespective, NPPF requires that a 5-year deliverable supply is identifiable for a proposed Development Plan to be positively prepared, and therefore “sound” in the sense of NPPF paragraph 182.

The Trajectory presented in support of LPP2 relates only to the additional quantum identified by this Plan, without there being any means of cross-referencing to the wider evidence base supporting the deliverability of sites within the District as a whole. This, to say the least, unhelpful, and lacks transparency. It is not just the case that LPP2 identifies sites solely to meet unmet need arising from the City of Oxford. A significant residual quantum is required to meet the endogenous needs of the District itself.

Since the examination of LPP1, it is true that consents have been issued, very recently, at both Grove Airfield and Crab Hill, allowing these strategic allocations to start coming forward in the relatively short term. Other smaller commitments are also moving forward, such as North of Shrivenham and at Kingston Bagpuize, in the A420 corridor. However the position has changed since the examination of LPP1 and it is necessary that the trajectory of the Plan as a whole remains transparently sound in this regard, as this overall position is the basis upon which decision taking must be based. Without comprehensive evidence on this matter, that can be fully examined in due course, it is not evidently the case that the Plan can be judged sound, as insufficient evidence has been provided.

2.3. Sustainable Transport Study for the Abingdon-Oxford corridor

Stagecoach notes and welcomes that a major study has been done looking at the linkages between the Vale, and the city of Oxford, with particular reference to the need to maximise use of sustainable modes. This demonstrates a clear intent to ensure the Plan is in conformity with NPPF paragraph 17, which among other things requires patterns of development to be actively managed to make the fullest possible use of sustainable modes, and paragraph 29, which requires plans and decisions to rebalance transport systems towards more sustainable modes. It also aligns with the delivery of adopted Core Policy 33, Promoting Sustainable Transport.

It is also a requirement of NPPF that Local Plans and their development strategies must be deliverable, and viable, in both a technical and an economic sense. With regards to transport infrastructure and services, NPPF places a clear and explicit requirement on plan-makers at Paragraph 177, to prepare plans in dialogue with infrastructure and service providers. This responsibility should translate to those contractors preparing the evidence base with respect to such infrastructure.

Stagecoach wishes to advise the pending Examination in public into the Plan, that such dialogue has been very limited, and with respect to two very important aspects of the sustainable transport infrastructure in support of the LPP1 and LPP2, completely absent.

The Oxfordshire Local Transport Plan “Connecting Oxfordshire” (LTP) and its supporting Oxford Transport Strategy (OTS) are the starting point for the transport evidence base for this Plan and LPP1. This is perfectly understandable, and it is commendable that these Plans pre-date the LPP2.

However there is no legal standard set for the quality of evidence required in support of Local Transport plans, nor are such plans scrutinised or subject to any formal process of testing. Accordingly the County Council has progressed and adopted its Transport Plans with very little clear regard to the commercial and operational aspects of many parts of key elements of their strategies.

The current LPP2 and the sustainable Transport Study takes the strategy of the LTP and OTS as a given, presumably by virtue of their provenance at the County Council. We must stress that these are documents that originate entirely within the County Council. Not only that, but many of the key elements within the OTS are uncoded, and have been subject to little or no input from existing or potential operational or commercial partners.

In particular, Bus Rapid Transit as a concept amounts to little more than “lines on a map”, with no supporting breadth or depth of analysis as to the nature of the service to be operated, and the feasibility of any capital schemes needed to facilitate it. BRT has no clear project specification or scope, no clear timescales, and no clear means of delivery. For example, given that the alignment of all the BRT corridors largely follow existing major existing bus services, it is not entirely clear if the vision is for infrastructure to deliver seamless bus priority, conversion of existing service to continental style “standee” services with single deck multi-door vehicles modelled on light rail configurations, or a combination of infrastructure and entirely new service capacity that would run alongside existing bus services, that may or may not be permitted to use the infrastructure.

BRT in OTS overlays the existing commercial bus network, and if implemented “on top of” existing commercial services, it could well significantly destabilise existing services.

It is important that stakeholders are clear that while many aspects of the vision are welcome and supportable, BRT is far from being a clearly defined or demonstrably deliverable measure.

The Outer Park and Ride sites at both Lodge Hill and at Cumnor have seen no recent engagement of either local major bus operator. Oxfordshire County Council originally arrived at this strategy within OTS without any consultation at all with ourselves. Whilst we made a single set of formal representations at length to the Oxfordshire Local Transport Plan and to the supporting Oxford Transport Strategy, we see no clear evidence that this comprehensive input has had any significant influence on the County’s adopted Transport Strategy.

Since then we are aware that the County Council has expended some meaningful resources on consultancy studies regarding the Outer Park and Ride sites. These are not all public documents, as far as we can tell. We have had very limited opportunity given to us to work on an ongoing basis with the consultants on either the County’s Park and Ride studies, or the current work for the Planning Authority.

The same has been true for the Sustainable Transport strategy commissioned by the Vale of White Horse, where our involvement has been at a single stakeholder workshop, on a date set that did not permit anyone with a strategic responsibility to take part. We have tried to submit as much input as we could at the time, but we have had no direct involvement in the formulation of the options taken forward into the document. This has resulted in the option development and screening part of the Study being rather limited in the expertise on which it has drawn from the operating industry.

There is another question as to how far the Council's Sustainable Transport Study achieves much that meaningfully adds to or in any way progresses towards delivery what is separately already proposed in very broad terms the OTS. While the feasibility work in support of BRT and the Outer Park and Ride sites has been advanced to a certain extent by the County Council it is not clear at all how the Planning Authority or the County as Highways and Transportation Authority considers that this forms part of the evidence base for the Plan. It circumstantially appears that neither wishes to rely greatly on this separate work.

When looking at the STS, and the evidence it adduces to support the Plan, we in particular must challenge strongly the idea that a single vehicle operating resource could provide a service from Cumnor to Oxford City centre, or that 1-2 buses could deliver a service from Lodge Hill (STS table 9 page 46). It is far from clear what the "existing level of service" referred to at para 5.23.20-21 refers to, especially given an apparent implicit assumption that a new BRT service would serve the sites, rather than reliance on existing services. Indeed, the methodology supporting these figures in the STS is not set out, and this part of the strategy is entirely lacking in transparency, and as a result leads to conclusions that are in our view grossly misleading. In the case of Cumnor, a single vehicle would be able to deliver hourly departures from the site to the City, based on the 22 minutes journey time quoted. We would suggest a 30 minute frequency would demand 2 buses, assuming that this could be reliably operated at peak, which could be exceedingly optimistic, depending on how far comprehensive bus priority needed to be extended to the site.

Examination and comparison of table 10 suggests that the assumption is that the existing Seacourt Park and Ride service would extend out to Cumnor (and the Redbridge one to Lodge Hill). It also assumes that buses circulate continuously. This is not the case. Park and Ride buses are timed to stand at the sites for significant periods especially off-peak. They provide a warm place to wait, and the bus parked creates customer confidence that their journey will continue without great delay. The table 9 results still do not tally with such an assumption.

As matters have progressed, and more detail has emerged on the Outer P+R proposals, including the sites safeguarded within this Plan, Stagecoach has become progressively more and more concerned that the Cumnor site in particular will, if implemented with a new dedicated service overlaying the existing commercial provision, serve only to tend to undermine existing commercial bus services on the corridor, and could encourage travellers who might well otherwise seek to use a bus service from nearer their point of trip origin, to drive down strategic highways network towards Oxford, adding significant burdens to already challenged links and junctions en-route.

We would suggest that for Outer P+R sites to be effective, they need to largely depend on existing passing commercial bus services. They therefore need to be sited and designed in such a way that passing buses can easily and quickly divert in and out in both directions with minimal delay to through passengers. While the OTS appears to assume that a new dedicated P+R service will serve and terminate at the Cumnor site as a "BRT" service, the Sustainable Transport study itself recognises at paragraph 3.3.13 that *"The proposed sites will serve as key modal interchange points for drivers to transfer from their cars to mass transit services across the city either through direct services or efficient transfers at key interchange points. Therefore, the **facilities at the Park & Ride sites will need to allow passing (bus) services to interchange efficiently and seamlessly.**" (our emphasis).*

Additionally, a successful P+R site needs to maximise its rate of interception of passing traffic. It must be highly visible to passing traffic, and provide a short, very logical means of entry from the target corridor.

It is far from clear to Stagecoach that sites available to the Council at Cumnor for such provision, and that selected for safeguarding within the Submission Plan in particular, could ever realistically facilitate either a reasonable rate of interception (thus materially damping demand for the site, and its services; and its resulting effectiveness), nor efficiently take advantage of passing services. This is because the site lies south of the A420 by some distance. Junction arrangements at the Cumnor Interchange are also unusually complex, and unfortunately do not at all lend themselves to buses, or motorists either eastbound or westbound, making quick and simple movements to enter or leave it. We believe the site represents a high-cost, relatively low-demand and low-effectiveness solution. We also note that the safeguarded site (as all the options) is within the Green Belt, and while this is far from an insurmountable problem, it certainly adds a further level of complexity in site delivery.

We are of the strong considered view that a dedicated bus service to the Cumnor Park and Ride site could not be economically justified at any stage, and would require significant ongoing public subsidy, at a high rate. This view has previously been expressed in our responses to the OTS consultation, and it has not changed. There is no clear means of funding such a subsidy. Oxfordshire County Council has no budget for funding any socially necessary but commercially unsustainable bus services, having abolished it in Summer 2016. Even if a funding stream were to be found, for example through a future road pricing or workplace parking levy, it is not clear that this would represent an economically rational or optimal means of solving the problem. When carbon mitigation and air quality impacts of this strategy are compared with one that consolidates travellers onto high-capacity vehicles at or near their residence the case for this one of the proposed Outer Park and Rides, at least, is further undermined.

Nor does the County Council have a clear means of funding the ongoing maintenance or operation of the capital asset a major Park and Ride at Cumnor would represent, unless they charged for parking, as is the case at the existing park and ride sites. We are aware the popularity of the existing sites means that both City and County Councils make a significant surplus. However, the ability to charge depends on the price/value trade-off between the various options available. The Outer P+R sites, to be successful, would need to offer free parking to incentivise motorists leaving their car further out, and a longer bus journey. Today, the existing Bicester Park and Ride is free to use, and we are not aware that the County Council has any intention to charge at the proposed Eynsham Park and Ride, for this reason.

2.4. Maximising the effectiveness of Public Transport in support of the Vale's Development strategy: Local Park and Ride Points

While Stagecoach agrees that in many places the OTS' Outer P+R strategy has much to merit it, this is true where facilities are optimally sited, can leverage local demand from the immediate hinterland, and can make use of and help stimulate further improvements to commercial bus services in the wider corridor concerned.

Given that existing “Premium Bus Services” referred to in the Oxfordshire LTP and OTS on the A338 (svc S8-S9) and A420 (svc 66) corridors already come close to offering comparable frequencies to the current dedicated P+R services at Seacourt in particular (and well exceed them on the Abingdon-Oxford corridor), with the further likelihood that these frequencies will increase in the fairly short term, there seems little point pursuing a transport strategy that assumes high and increasing volumes of car movements will continue to exist on these corridors in parallel with the these services.

Evidence in the Sustainable Transport Study shows that there are significant challenges in accommodating traffic on the network, well outside the interception point proposed at Cumnor. Frilford lights on the A338/A415 junction are evidently a particular concern to the County Council.

Three are thus very strong reasons to seek to damp demand car-borne trips before they reach these junctions and portions of road.

We would suggest that it is more rational to progress a strategy that intercepts journeys much closer to their true origins. It would be more economically efficient and achievable, and is clearly better aligned with NPPF paragraph 41 where plan strategies, and the transport measures in support, strategies should seek to cost-effectively limit the need for major highways improvements. Unloading the highway network by consolidating Oxford-borne trips as close as possible to the “front door” represents just such a strategy, rather than one relying on unconstrained use of single-occupancy cars to continue to seek destinations at Park and Rides sited around the periphery of the Oxford built-up area.

We submit that the A420 corridor already reflects an excellent exemplar of how demand from a very broad hinterland can be very effectively consolidated onto a high-quality, high-frequency inter-urban service, by the implementation of a number of local smaller Park and Ride, or “Park and Change” sites, each of which would be relatively modestly sized, incorporating up to perhaps 200 spaces each. These would be sited where possible taking advantage of local facilities provided at a mixed use hub. This would provide the scope to conjoin the “last mile” trip to and from the bus service, with other local journey purposes, including convenience shopping and picking up and setting down children at nursery settings or primary schools. A number of dedicated short stay spaces would ensure that sufficient spaces remained available throughout the day to serve incidental trips.

There is clear evidence on the A420 that informal Park and Change already takes place, for example at Shrivenham and Southmoor. This can be a nuisance, for example at Shrivenham High Street, where the availability of parking for local businesses is becoming constrained as a result. The fact that this is already noticeably happening, so far for Oxford, gives good grounds to believe that dedicated purpose built facilities would serve to unlock a significant amount of existing suppressed demands, as well as facilitating much more sustainable patterns of movement from new developments.

As we make plain elsewhere in our representations, there is a very clear case to be made to seek to consolidate trips originating within Wantage and Grove onto public transport at a local Park and Ride that would be sited on the A338 immediately north of Grove. This is because the nature of the urban structure of both settlements mitigates very strongly against the provision of a single, simple and

direct bus corridor that would offer the highest possible bus frequency along a logical route. These features of the urban morphology include:

- The severance effect of the Letcombe Brook
- Very narrow historic routes taken by the limited number of highways from Wantage town centre allowing bus routes to easily reach the western parts of the urban area, west of the Letcombe Brook, via Denchworth Road.
- Incremental patterns of planned development, that have created hard and impermeable urban edges. This makes it especially hard to integrate the existing built up area with the new development. This is particularly true for Grove Airfield and Monks Farm. The same is also true to a lesser extent, between Charlton Village and Crab Hill. The result is that to serve new developments, a separate parallel bus route is usually required.
- The location of Wantage Town Centre as the historic service centre, at the far southern edge of the combined built-up area of both settlements. It therefore cannot function well as a hub for local services, or a place where a single frequent trunk route can serve, and then “fan out” beyond to service a broader series of discrete neighbourhoods beyond, as is the case for example in Bicester. Worse still, we recognise that the historic Market Place is under pressure for space and the competing demands on this focal part of the historic townscape are such that it is entirely inappropriate for use as a place where people can pick up and set down passengers, much less as a means of easily and conveniently accessing bus services by other modes.

This Park and Ride would perform the same consolidating role as a town centre or local village centre ordinarily might in other contexts.

Without a facility making it easy and convenient to take advantage of the highest service frequencies, and fast overall door-to-door journey times, it is not credible to suppose that bus mode shares would be greatly higher in the proposed new developments than they are today in Grove and Wantage. Census data from 2011 suggest the peak bus mode share for Journey to Work is between 4.2 and 5.8%, from origins within Wantage and Grove. The counter-argument is that, with such a facility in place, bus mode shares to Oxford in particular could be increased by a multiple, to something closer to that achieved from Abingdon to Oxford: well over 22%.

The proposals at “Tulwick Park” East of the A338 at Grove could provide approximately 350 car parking spaces at a point where all the current and future bus services to Oxford and Abingdon will pass. It can most effectively intercept car-borne journeys that would otherwise need to run along the A338 at least 8 miles to any Park and Ride at Cumnor, and at the moment would be more likely to use the existing facility at Seacourt, within the Oxford Ring Road. Up to 350 car movements currently using the corridor could be abstracted from traffic flows, many or indeed most likely to be at peak times.

This facility in combination with potential local “Park and Change” sites on a smaller scale on the A420 at Kingston Bagpuize, Faringdon and Shrivenham of up to 200 spaces each, could provide between them well over 600 spaces in a manner that unloads the links and junctions on both corridors far beyond the approaches to Oxford. This would not require uneconomic dedicated bus services, duplicating and undermining the wider commercial bus provision. Nor would the

facilities need to represent an ongoing maintenance burden to the County council or the public purse more generally, if they were combined with mixed-use local centres.

2.5. Stagecoach Bus Service provision to proposed major allocations: current position

Stagecoach is fully engaged with all stakeholders in the development sector with a view to identifying and bringing forward the most sustainable possible pattern of development, served by the highest possible quality of bus services and infrastructure.

Given our involvement in the Plan area is focused on the A420 corridor (Stagecoach West service 66) and the A338 corridor (Stagecoach in Oxfordshire services S8 and S9) our input and involvement has largely been towards the western part of the Sustainable Transport Study area. Go-Ahead Group bus companies provide the majority of services in the A34 corridor and the bulk of Science Vale.

We would advise that since the evidence base was prepared:

- Stagecoach West has increased the off-peak daytime frequency on service 66 to every 20 minutes Monday-Friday, to offer a consistent frequency throughout the day Monday-Saturday
- Stagecoach in Oxfordshire has renumbered the X30 Wantage-Grove-Oxford direct service to **S9**. This is now a premium “Gold” branded service. There have been improvements to peak and evening frequencies associated with this change
- Stagecoach in Oxfordshire has renumbered the 31 Wantage-Grove-Abingdon-Oxford service to **S8**. This is also now operated with premium “Gold” specification vehicles. The service now directly served areas in grove west of the Letcombe Brook around Denchworth Road and Brereton Drive, for the first time.

2.6. Specific bus service and infrastructure proposals emerging in support of proposed development sites

Stagecoach confirms it has been in extensive discussion with development promoters and their client teams on proposals including

- Draft Allocation East of Kingston Bagpuize
- Draft Allocation at Dalton Barracks (with Go-Ahead Group)
- Omission Site at “Tulwick Park” Land East of A338 (Station Road), Grove

2.6.1. Land East of Kingston Bagpuize

Notwithstanding the comments at section 2 of the Sustainable Transport Study, Stagecoach West confirms that it is agreeable to alter or otherwise divert service 66 to ensure that the proposed allocation at Kingston Bagpuize can be directly served by this service, as well as the existing service 15 between Witney and Abingdon. The whole site would be within 400m of stops on the proposed A420-A415 link Road. We are also examining the potential to provide local Park and Change facilities within the proposed allocation, to help consolidate travel demands from more diffuse origins onto the service, before it reaches the A420 or A415.

We see this service developing further to provide a 15-minute frequency between Swindon and Oxford via the site, in the reasonably short term, within the first 5 years of the Plan period. This would be an exceptionally high level of service for an inter-urban corridor. However looking beyond in time, and having regard to some other wider experience, it is possible to suggest that an even more frequent service might be possible on all or part of the route.

It is worth pointing out that journey times from the site to Central Oxford will be about 21-22 minutes. As the service in practice runs all but non-stop to Seacourt Park and Ride, there is no time penalty over driving, and when finding parking and the friction associated with using the Park and Ride is concerned, at Seacourt or any site at Cumnor, the bus is likely to be significantly quicker and more convenient. The attractiveness of the service is already being recognised along the corridor as a whole with double-digit year on year patronage increases, even before large numbers of committed dwellings are occupied. We would also point out that scheduled journey times from sites proposed on the edge of Oxford in other Districts will exceed this journey time substantially (for example, service 16 from Greater Leys is scheduled to take over half an hour to get to the City Centre). The proposed allocation is thus exceptionally well-placed to meet Oxford's unmet need in a sustainable location, where the use of bus services is likely to prove to be very high, with a peak mode share credibly exceeding 25% for journeys into the City.

Currently service 15 provides a limited service between Kingston Bagpuize and Abingdon. However, significant population growth on the corridor at both Kingston Bagpuize and Marcham, as well as within west Oxfordshire, does give reasonable grounds to suppose that a reinstatement of an hourly frequency might be possible in due course, subject to suitable pump-priming funding becoming applicable when the development trajectory is in train.

It is clear that this site can already be very well-served by public transport indeed, with strong grounds to assure stakeholders that an exceptional level of public transport provision can be provided and sustained during and after the development period.

2.6.2. Land at Dalton Barracks

Dalton Barracks lies considerably off-line of any existing frequent bus service. It is also relatively distant from the city when a bus journey is considered, via Abingdon or Cumnor/Botley. The quantum of development deliverable in the Plan period is modest, and accordingly, the level of demand that would sustain an increase in provision is relatively limited.

That said, based on meetings with the promoter's consultant jointly with Go-Ahead Group, we agree that an urban design response is possible that would take the best possible advantage of the current services available, and would serve to facilitate a sustainable frequency uplift.

We do not see that a dedicated bus only link across open countryside and crossing the A34 to Lodge Hill would be either economically feasible, practically deliverable, or serve to sufficiently reduce bus journey times to materially influence mode choice.

Given that it would serve only the new settlement, its impact would be entirely restricted to journeys originating from the site itself, and its economic benefit relative to its cost would no doubt be grossly inadequate to justify the necessary funding. The kinds of monies involved (which could be expected to exceed £20m) should be applied to bus priority on existing or proposed corridors that sustain

much higher flows and public transport frequencies, with commensurately much greater mitigation impacts.

2.6.3. "Tulwick Park" Land East of the A338, Grove

The site lies directly on all the bus routes serving Grove and Wantage from Oxford, and the most direct bus route from Abingdon. Uniquely the site is positioned to be directly served not just by all existing services in the corridor, but any enhancements to them, or any new service variants that are likely to prove to be necessary in the longer term to serve Monks Farm and Grove Airfield, which are among the strategic allocations in the LPP1, and are now to a great extent commitments.

The site is also situated immediately due south of the Great Western Main Line close to the site of the original Grove Station. The site offers by far the best and easiest means to provide a new railway station, readily accessible directly from the A338 without recourse to third party land, at such a time as this proves to be feasible, directly at the point the railway is intersected by a key public transport corridor.

The whole promotion lies within 650m of existing bus stops on the A338. However the promoter proposes to create a local Park and Ride facility offering up to about 350 spaces, associated with a mixed use local centre and primary school site. This would serve to intercept trips originating to the south, within the settlements, and consolidate them onto existing and future improved services, well before they reach the points on the network where it is under pressure.

It would also bring all these bus services onto the site, and reduce walking distances to services operating in both directions, to ensure that walking distances from all dwellings will be within 500m of the bus stands, and most homes will be well within 400m of them.

The nature of the current LPP1 strategy is such that strategic allocations have been sited around the existing built up areas with little or no regard to the effective integration of land use with current and potential major bus corridors. The Grove Airfield site, an allocation that dates back two plan-making rounds, is particularly problematic inasmuch as it will require, in effect, a new service running parallel to the current corridors, to bring residents within reasonable reach of a stop. This is reflected in the County Council's Science Vale Transport Strategy, and the bus service proposals set out within it. We agree with the County that the urban extensions at Grove Airfield and Monks Farm in all probability will not support bus services of more than 30-minute frequency within them, and it will in any event be a very considerable time before any such services could be practically delivered. This will be insufficient to provoke a major change in travel behaviour, whether for local or longer-distance services.

By providing a local hub served by all the relevant buses in the corridor, it is very credible to suppose that local residents would seek to take advantage of the much higher quality of service available, if suitable facilities were provided. As well as traditional Park and Ride, this is very likely to include journeys by walking (within 1km), cycle, and for pick-up/drop-off (Kiss and Ride). Such a site could also facilitate lift-sharing, further damping demand for single occupancy vehicles in the corridor to the north.

Stagecoach is fully engaged with the promoter and its client team to support the detailed design and ongoing delivery of this facility.

We believe that this site represents a superlative opportunity to the council to allocate a site, able to deliver a significant quantum of development within the Science Vale “ring fence” in a location that is able to benefit from, and further facilitate improved access from the wider area, to among the highest level of public transport provision, such that this provides the most credible possible travel choices against car use, in the short as well as longer term.

The site also allows for the delivery of a new station serving Wantage and Grove, at what appears to be a location that can be very easily be integrated with the highway network allowing wider access to its hinterland, and where the park and change facilities provided for buses in the short term would equally future-proof for excellent bus-rail integration at any stage that the station were to be delivered in future.

More than almost any other option available within Wantage and Grove, and the wider South East Vale sub-area, this promotion represents an opportunity to actively manage patterns of growth and development to make the fullest possible use of sustainable modes, as required by NPPF paragraph 17, 29 and 32, and rebalance transport systems towards more sustainable modes, giving people a real choice as to how they travel.

3. Soundness of Proposed Policies

Stagecoach restricts its responses to the more strategic elements of the Local Plan Part 2 outlined in Chapter 2, Additional Sites and Sub-area Policies”. It has no view on the more detailed development management policies set out elsewhere in the submission Plan.

With regards to the published Policies in Chapter 2, if Stagecoach makes no comment below, it can be assumed that we consider the proposed Policy sound, and we are broadly in support.

3.1. Policy 4a Meeting our housing needs

i)	Legally compliant	Y
ii)	Sound	N
iii)	Complies with Duty to cooperate	Y

Stagecoach objects to the Policy 4a as we dispute that the evidence fully and adequately supports the identification of all the sites selected as representing those options that in the round, result in a pattern of development that allows the fullest possible use of public transport to be made, as required by NPPF paragraph 17 and paragraphs 29-35.

In particular, Stagecoach questions that allocation of further land for development North West of Grove, a great distance away from any existing bus services, represents a more sustainable option than land directly on the main inter-urban bus routes from Grove and Wantage to both Oxford and Abingdon, lying east of the A338.

The proposed allocation North West of Grove essentially depends on the prior completion of a very large amount of development to the South at Grove Airfield, and to the East at Monks Farm. At a

point relatively late in the development trajectories of each of these two strategic allocations in LPP1, a spine road is proposed to be made available.

In the case of Grove Airfield the key trigger is 1500 occupations. Since delivery has yet to commence on this site, it is not unreasonable to conclude that this is unlikely to be reached until late in the Plan period. Given the costs and dependencies associated with this link, and the well-known challenges arriving at an acceptable developer obligation deed for this site, on viability and land valuation grounds, it appears quite plausible that it may not occur within the Plan period at all.

Equally, it needs development to be well advanced if not largely complete at Monks Farm to the east, to permit access to and through this site, for general traffic.

It would need all the land either side to have delivered spine roads either to the vicinity to provide a through route; or the respective boundaries of this site, before any bus service can credibly be provided. Before which point it is impossible to see how this site, or its neighbours, can be directly served by bus.

Even at the stage such a service becomes possible we do not see that more than a half-hourly service is likely to be commercially sustainable.

By extending the proposed development area still further away from current and foreseeable bus services, this proposal will be built and occupied such that there is no credible choice of how residents will be able to travel, except by private car.

3.2. Policy 8a Additional Allocations for Oxford Fringe and Abingdon Sub-areas

i)	Legally compliant	Y
ii)	Sound	Y
iii)	Complies with Duty to cooperate	Y

Stagecoach supports the Policy to allocate a number of sites in the Abingdon and Oxford Fringe sub-area.

The sites identified in this Policy are all already reasonably well-served by public transport, or could be.

In particular, Stagecoach **supports** the identification of **land East of Kingston Bagpuize**. This site can benefit from existing high-quality public transport and emerging master planning demonstrates that dwellings here would be within easy reach of service 66, and service 15, thus providing direct links to Abingdon and Witney as well as to Oxford and Swindon via Faringdon. Stagecoach West is prepared to divert the service to serve the site, subject to the agreed diversion not significantly extending end-to-end journey times on the route.

Stagecoach West would advise that frequencies higher than every 20 minutes are likely in due course to be commercially sustainable on route 66 subject to further such upgrades on a long, high mileage route benefiting from an appropriate level of pump-priming funding. Further improvements to evening services, and Sunday operations are also likely to prove to be deliverable in the near term. We would additionally point out that bus journey times to Oxford are already scheduled to

take less time than those from within the City, from peripheral locations within the built-up area. Funding has been secured to deliver major improvements to bus priority on the Botley Road westbound, complementing existing eastbound provision. This can be expected to assist improving journey times and reliability during the afternoon and evening peaks. As a result, development here benefits from connectivity to Oxford that in many respects is equal or even superior to many potential development sites on the edge of the Oxford built-up area.

Stagecoach in Oxfordshire **supports** the identification of land north and north east of East Hanney for development on a smaller scale.

These sites directly take advantage of services S8 and S9 providing regular and direct links to both Oxford and Abingdon, as well as Wantage and Grove. Both routes are likely to benefit from further increases in frequency and timetable coverage into the future. Even today the sites benefit from a level of public transport provision that equals or exceeds the level that can realistically be envisaged to be sustainable at strategic allocations West of Grove in particular.

Again we would point out that scheduled journey times to Central Oxford are equal or better to those that are achievable from many potential sites on the fringe of the City's built-up area.

Land South East of Marcham is served by service S9 linking it to Abingdon and Oxford as well as Wantage and Grove. This provides an hourly service, though a service is operated 7 days a week and evening services are also offered. We concur that the County's expectation that this service could sustain a higher half-hourly frequency is realistic in the longer term on a commercial basis, subject to suitable pump-priming funding being made available in due course. Stagecoach **broadly supports** this allocation as being relatively sustainable in the round, given its limited size. We also recognise that this site, along with those at East Hanney, is likely to be able to contribute to housing supply in the short term with few obvious constraints or lead in times associated with technical matters, or large-scale infrastructure. This will add resilience to the housing trajectory.

While Stagecoach broadly **supports** the identification of up to 1200 dwellings to be provided at Dalton Barracks, within the Plan period, we have some reservations that the sustainability of this site is not hugely overplayed. While a reasonable level of bus service can no doubt be provided in due course, we cannot see that a business case exists for a dedicated Busway link to Lodge Hill. Even if it were, this in all probability would tend to imply that services provided along it would skirt rather than serve Abingdon, and/or that the current Oxford service would abandon its current route through Wootton and Cumnor. For a development limited in scale to 1200 dwellings, neither scenario would appear especially plausible to us.

3.3. Policy 8b Dalton Barracks Comprehensive Development strategy

i)	Legally compliant	Y
ii)	Sound	N
iii)	Complies with Duty to cooperate	Y

Stagecoach is concerned that aspects of the development strategy for Dalton Barracks are unrealistic, and that the supporting evidence for aspects of the transport strategy for the allocation are insufficiently robust or well-evidenced. While these do not irreparably prejudice the potential suitability and potential sustainability of the site for up to 1200 dwellings, NPPF paragraph 77

requires that Plans are deliverable and viable. It is important that the Policy Framework that justified the site being brought forward is realistic, rather than the site being subsequently prejudiced by a range of policy requirements that are likely to be either ineffective, or undeliverable, or both.

As we have set out in more depth elsewhere in these representations, we are not of the view that there is a sufficiently clearly deliverable strategy to provide a BRT-served Park and Ride at Cumnor in particular, to be able to rely upon this infrastructure. Even if it were, there is an inherent inconsistency with wishing to reduce car-dependency from this site, and the assumption that significant numbers would seek to use that facility rather than bus services provided from the development. The same is even more true of the proposed Busway to Lodge Hill, where 1200 dwellings will never deliver sufficient passenger volumes, even at exceptionally high mode shares, to justify frequent bus services along it.

Rather, we would suggest the assumption is that improvements to the existing services are most likely to provide the public transport choices from the site. It should also be pointed out that the site's relative remoteness from the main existing high frequency inter-urban radial bus corridors tends to significantly mitigate against the most competitive journey times by bus from this site compared with other options proposed in this Plan, Kingston Bagpuize in particular; or those north of Abingdon and Radley that are already allocated in the LPP1.

Stagecoach nevertheless strongly supports the northbound A34 bus lane from Lodge Hill to Kennington Interchange which represents excellent value for money given the very high frequency and utilisation of bus services long this corridor, which can be expected to be further boosted in support of development being brought forward in the near vicinity in due course. This could include out S8 and 34 services, as well as other operators' routes from points further south including Didcot. We would also urge that this is approached by Highways England and the County Council as part of a wider strategy to manage the pressure in the corridor as a whole in the short-medium term, which should include similar provision north of Oxford between Kidlington and M40 junction 9.

3.4. Policy 12a Safeguarding of Land for Strategic Highway Improvements within the Abingdon-on-Thames and Oxford Fringe Sub-Area

Stagecoach supports in principle the safeguarding of sites for all the above schemes, though we reiterate our concerns about the effectiveness and deliverability of a Park and Ride at Cumnor and likewise a bus-only link between Dalton Barracks and Lodge Hill.

3.5. Policy 15a Additional Allocations South East Vale sub-area

i)	Legally compliant	Y
ii)	Sound	N
iii)	Complies with Duty to cooperate	Y

Stagecoach objects to the Policy.

The Plan is not compliant with NPPF which requires at paragraph 17 that patterns of development are actively managed to make the fullest possible use of public transport, as one of a number of more sustainable modes, and also demands at paragraph 29 and 31 that safe and secure access for all should be provided via a variety of modes, giving residents a real choice about how they travel.

The proposed allocation North West of Grove makes sense only in that it rounds out and consolidates two existing developments at Grove Airfield and at Monks Farm, that are currently allocated. The larger of these, at Grove Airfield, is not a new allocation but represents a site that has been proposed and allocated by successive local plans over quite some years. In many ways this represents an anachronistic approach to development, the result of which is that a large proportion of dwellings allocated in the South East Vale Sub-area are to be sited in a location where a great many are likely to be without a good public transport choice for many years after occupation.

The delivery of the North Grove Link Road no doubt represents an important link between the Airfield site, and the A338, through Monks Farm. Allocating a portion of the proposed site to help bring this forward makes some sense, in particular if there is no other practical way to secure a sensible alignment. However, the Airfield only needs to provide a spine road link to the Denchworth Road to the north of the site, to connect with the North Grove Link Road through this proposed allocation, at the 1500th occupation, which could well take place very late in the Plan period, and potentially not at all before 2031. In any case, alternatives already exist that could provide a bus route from Grove Airfield via Grove Green, well before that date.

While this “die has been cast”, it makes little sense to perpetuate the error, certainly when much more sustainable locations exist in the near vicinity, directly served by existing regular high-quality bus services.

Not only that, but one omission site in particular, Land East of Grove, is in a position to directly address the limitations of this and other existing allocations, by providing a means to consolidate traffic movements before they reach those parts of the highway network north and east of Grove that are likely to come under severe pressure if car-borne traffic from these allocations seeks to use them in large numbers. A Park and Change facility east of the A338 is proposed as an integral part of these proposals, which would provide very convenient access to the full range of bus services running between Wantage and Grove, and both Oxford and Abingdon, from all existing and committed residential origins within both settlements; thus serving to help directly alleviate pressure on all these highways links. As service frequencies continue to improve on both service S8 and S9 in due course, the effectiveness of this facility can only be expected to increase, and the positive role such infrastructure would play in stimulating early increases in demand for these routes could be expected to create a “positive spiral” of bus use, leading to improved services, and further incremental growth. Such an opportunity then tends to serve to cost-effectively limit the need for complex and difficult highways improvements on the highways to the north and east, especially in the short-medium term. We note, for example, that while land is reserved for a new Marcham Bypass, no means of finding it has yet been identified.