

## Vale of White Horse District Council

### Proposed submission Local Plan part 1: Strategic Sites and Policies

PART A Personal details

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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?

They build on the previous representations duly made to assist policy formulation, which are not repeated, and which still stand, for consideration by the Inspector appointed by the Secretary of State.

## Part B Representations

### Chapter 2 Key Challenge and Opportunities

#### Para 2.13, Supporting Sustainable Travel and Improving Public Transport

Stagecoach considers this aspect of the Plan to be

4 i) Legally compliant	Y
4 ii) Sound	N
4 iii) Complies with the Duty to Co-operate	Y

5) Reasons why Stagecoach considers the Plan policy to be unsound:

Stagecoach welcomes and supports the intent of the Plan and in particular, notes and supports the much clearer and more explicit focus on identifying a deliverable transport strategy that rebalances transport provision towards more sustainable modes. We also recognise, and applaud, the tighter focus on a hierarchy of modes, and the greatly enhanced role that public transport needs to play to deliver sustainable development on the scale required.

The language following para 2.13, does not follow from these stated objective strongly enough. Singular intent will be needed to achieve the step change in public transport quality, availability and relative attractiveness over car use. Thus the Plan is **not sufficiently effective** in providing the clear rationale for subsequent public transport scheme that will need to be identified and funded. While Stagecoach has made significant recent investments in improving key inter-urban services, and will continue to do so, services are already constrained at peak times, not least by existing traffic congestion. Both additional capacity and frequency will be needed across the network, to sustainably accommodate travel demands, and provide flexible attractive choices for motorists.

Such an approach is also supported by the evidence underpinning both this Plan, and the emergent Oxfordshire Local Transport Plan 4. This includes investigation of “Science Vale Transit” concepts.

6) Stagecoach suggests the following modifications to make the Plan sound:

The wording therefore should be changed to flow from the identified objectives, and evidence base, and support the alignment of the Plan much more closely with LTP4, as follows:

- ~~“Maintaining~~ ***Seeking to improve, as far as possible, the very good existing commercial*** bus services, particularly between the main settlements, ***while also ensuring new strategic developments are linked to one another, and the major service and employment centres, by direct high quality links, incorporating priority for public transport.***
- Providing ***resources to kick-start commercially*** viable bus services in the more rural parts of the district, that ***can*** provide an attractive alternative to the car.”

Paragraph 41 of NPPF make clear that appropriate investments in public transport should be identified and secured, to reduce the need for highways capacity improvements. The Plan does not sufficiently clearly set its objectives in conformity with this requirement. The Objectives need to make clear that capital schemes should seek to incorporate public transport within their conception

and design, not least to ensure that congestion issues are not merely “exported” outside the Plan area.

The Plan is **not consistent** with National Policy in this regard, and **not sufficiently effective** in delivering sustainable development.

The wording should therefore be changed as follows:

**“Providing for new road infrastructure**

- Balancing the delivery of major investment in new roads and public transport, ***including incorporation of appropriate public transport priority within new road schemes***, with the wider needs for other infrastructure improvements arising from proposed development.”

## Chapter 3 Spatial Vision and Strategic Objectives

### Paragraph 3.2 and Spatial Vision

Stagecoach considers this aspect of the Plan to be

4 i) Legally compliant	Y
4 ii) Sound	N
4 iii) Complies with the Duty to Co-operate	Y

5) Reasons why Stagecoach considers the Plan policy to be unsound:

The spatial vision remains blind to the fact that sustainable delivery of the Plan as a whole demands a possibly unprecedented uplift in the provision and usage of local public transport, even when major road and rail improvements schemes are implemented. This is both disappointing, and renders the Plan **inconsistent with national policy, ineffective, and out of alignment with the evidence** emerging from transport modelling supporting both the Plan and LTP4.

6) Stagecoach suggests the following modifications to make the Plan sound:

The Spatial Vision should therefore be amended as follows:

*“Strategic **local public transport**, road and rail improvements will have been implemented, including those **linking** Harwell, west of Didcot and at Wantage.”*

*New development will have respected...*

*... through new development, which will be resilient to the likely impacts of climate change, **and will prioritise movement and accessibility by sustainable modes through its design and layout.**”*

Strategic Objectives 8 and 9 are insufficiently strongly-worded, inspecific, and lack the focus required to drive through the step changes in public transport accessibility, priority and service quality needed to rebalance transport towards more sustainable modes. The Plan is thus ineffective, and is inconsistent with National Policy (NPPF para 17) which requires patterns of development to be actively managed to achieve such a rebalancing by securing the delivery and use of improved public transport, as a more sustainable mode.

We propose that the language be modified as follows:

**“SO 8:** Reduce the need to travel and ~~promote~~ **actively manage growth to rebalance transport provision and use towards** sustainable modes of transport.

**SO 9:** ~~Seek to ensure~~ **Require** new development **to be** accompanied by appropriate and timely infrastructure delivery to secure effective sustainable transport choices for new residents and businesses.”

### Core Policy 3 Settlement hierarchy

Stagecoach considers this aspect of the Plan to be

4 i) Legally compliant	Y
4 ii) Sound	N
4 iii) Complies with the Duty to Co-operate	Y

5) Reasons why Stagecoach considers the Plan policy to be unsound:

Stagecoach is broadly strongly in support of the settlement hierarchy identified, and the approach taken to allocating strategic sites. Indeed, if desired, para 3.18 could be strengthened by adding that we consider that this approach supports both the more efficient delivery of bus services, and improvements to their quality.

However Stagecoach is perplexed that **Milton Heights** is considered to be an appropriate place for strategic growth. It is served by no public transport services, and is thus fundamentally unsustainable. Given that we had previously indicated that we objected to a much larger quantum of development here, on the basis that we did not see it anchoring demand for and attractive bus service, we are perplexed that just 400 units is now allocated, a substantially smaller one, that will not allow for the provision of any commercial bus service within credibly convenient reach of residents. Thus it cannot be made sustainable. **The Plan is thus inconsistent with national policy.** While the settlements hosts a primary school, that is the only local facility of note.

6) Stagecoach suggests the following modifications to make the Plan sound:

We therefore **urge that this proposed allocation be modified along the lines of comments set out for Policy CP 15**, and the quantum redirected towards locations benefiting from an existing high-quality bus service.

#### **Core Policy 4 Meeting Our Housing Need**

Stagecoach considers this aspect of the Plan to be

4 i) Legally compliant	Y
4 ii) Sound	Y
4 iii) Complies with the Duty to Co-operate	Y

5) Reasons why Stagecoach considers the Plan policy to be sound:

Stagecoach recognises the difficult challenge accommodating the housing need assessed from within the District.

Stagecoach considers that the proposed strategic allocations, with one exception, are either in sustainable locations, or ones that can be made sustainable, subject to appropriate developer interventions and contributions, including, where necessary, those required to initiate public transport improvements in advance from the demand materialising in full from developments, during the build-out period.

6) Stagecoach suggests the following modifications to make the Plan sound:

**Not applicable**

## Core Policy 5 Housing Supply Ring Fence

Stagecoach considers this aspect of the Plan to be

4 i) Legally compliant	Y
4 ii) Sound	Y
4 iii) Complies with the Duty to Co-operate	Y

5) Reasons why Stagecoach considers the Plan policy to be sound:

Stagecoach recognises that the overall quantum of housing supply demanded by the assessed need will be challenging to deliver on a consistent basis. It also recognises that this challenge arises to a very great extent, from the burden of infrastructural requirements arising both from opening up strategic sites, providing for residents needs, and mitigation of their wider impacts. The “lumpiness” of such investments requires a focused approach to delivery.

Stagecoach also recognises that provision of the step-change of public transport quality required by developments makes it essential that housing output is focused in such a way that demand is realised on key corridors at the fastest rate possible. Without this, the fixed costs of maintaining a high quality of service will not be offset by revenues, and the net balance to be met through developer funding will risk exceeding the monies available.

Finally, Stagecoach recognises that in policy terms, a large overall annualised quantum risks creating a situation where, short term there may be perverse outcomes should large-scale allocations be delayed for short periods. In such circumstances, Stagecoach has already seen that this is likely to lead to further applications as departures from the Local Plan, in far less sustainable locations, including many which do not benefit from high-quality public transport, nor would such service be achievable.

For these reasons, Stagecoach broadly **supports** this new Policy.

6) Stagecoach suggests the following modifications to make the Plan sound:

**Not applicable**

## **Core Policy 8 Abingdon-on-Thames and Oxford Fringe Sub-Area Strategy**

Stagecoach considers this aspect of the Plan to be

4 i) Legally compliant	Y
4 ii) Sound	Y
4 iii) Complies with the Duty to Co-operate	Y

5) Reasons why Stagecoach considers the Plan policy to be sound:

Stagecoach supports the approach taken to allocations in this area, recognising that locations have been selected that take advantage of the opportunities for sustainable transport, or have regard to opportunities to improve it in connection with development proposals, or both.

Stagecoach notes that an additional allocation is proposed east of Kingston Bagpuize. This will take advantage of the existing service 66 offering direct links both to Oxford and Botley, and Faringdon and Swindon. This service has already seen peak-hour frequency enhancement in Summer 2014, part-funded by developer contributions, and now runs up to every 20 minutes. Stagecoach sees potential for further development of this service, in line with rising population, with a view to significantly mitigating the impact of additional travel demands on the A420.

6) Stagecoach suggests the following modifications to make the Plan sound:

**Not applicable**



## Core Policy 11 Botley Central Area

Stagecoach considers this aspect of the Plan to be

4 i) Legally compliant	Y
4 ii) Sound	N
4 iii) Complies with the Duty to Co-operate	Y

5) Reasons why Stagecoach considers the Plan policy to be unsound:

Stagecoach recognises that provision of a substantially higher quality of local services, retail and amenities serving Botley and the Oxford western fringes materially contributes to sustainable development objectives.

However, Westway represents a very significant bus corridor, serving not only local services within Botley, but key inter-urban routes to Witney (5 buses/hour) and Wantage/Grove (up to 3 buses per hour). The intensity of operation in this area will need to rise, to accommodate population growth, and mode shift, both from the western Vale and large parts of urban west Oxfordshire. In addition, it is likely that existing Park and Ride facilities at Seacourt will be supplemented or replaced by new Park and Ride facilities on the A420 west of Oxford. Accordingly, the retention, and indeed enhancement of bus priority in this area should form an integral part of any scheme proposed.

The recent scheme, now refused, made no provision to maintain, much less materially improve, conditions for reliable efficient bus operation, despite space within the public highway being available to create seamless bus priority eastbound from the Eynsham Road to the existing bus lane underneath the Western Bypass overbridge. We urge that this is identified as a key element of infrastructure necessary to sustain both the development itself, and the overall development strategy for the District, which demand a step change in public transport availability and capacity for the required mode shift to be achieved.

The current Policy threatens development that prejudices the efficient and reliable operation of public transport adjoining this site, and fails to identify the strategic necessity to identify and protect opportunities for sustainable transport infrastructure, contrary to para 41 on NNF. The Draft policy is therefore ineffective, and inconsistent with National Policy. It also prejudices the emerging LTP4, and its subordinate Oxford Transport Strategy.

6) Stagecoach suggests the following modifications to make the Plan sound:

To address these issues, Stagecoach proposes that Policy CP11 be amended as follows:

“v. Proposals for the site are prepared through a comprehensive master planning process providing and integrated solution for site access, traffic management, air quality management, servicing and sufficient car parking, while prioritising **both** the pedestrian customer environment, **and ensuring that the opportunities to secure seamless bus priority and rationalisation of conflicting vehicular and pedestrian/cycle movements along West Way and Westminster Way are fully taken up.**”

## Core Policy 12: Safeguarding of Land for Strategic Highway Improvements within the Abingdon-on-Thames and Oxford Fringe Sub-Area

Stagecoach considers this aspect of the Plan to be

4 i) Legally compliant	Y
4 ii) Sound	N
4 iii) Complies with the Duty to Co-operate	Y

5) Reasons why Stagecoach considers the Plan policy to be unsound:

Stagecoach supports the Policy as far as it goes, but it is incomplete.

The Company regrets that a policy has not been written that ensures that development proposals take full account of the need to structure urban design in such a way that efficient high quality public transport, is facilitated rather than prejudiced.

It is still noteworthy that headline Policy focuses on the specification and safeguarding of highways scheme delivery, but still gives much less attention to securing efficient high quality public transport movement, despite this is at least as challenging to achieve. We do not accept that the accompanying Urban Design DPD is a sufficiently robust means to achieve this outcome, not least because its proposals are driven mainly by aesthetics and sustainable design and construction, not facilitating the best possible public transport.

Thus, the Plan is not positively prepared in order to secure the greatly increased level of public transport provision and use required to support its sustainable delivery, and thus this aspect of the Plan is unsound.

6) Stagecoach suggests the following modifications to make the Plan sound:

We therefore suggest the Policy CP12 is amended thus:

“planning permission will not be granted for schemes that prejudice the delivery or effective operation of the transport schemes listed above, ***or the delivery or effective operation of those public transport improvements specified in the Oxfordshire Local Transport Plan and its daughter Policy documents relating specifically to this part of the Plan area and its immediately adjoining environs***”

## Core Policy 15: Spatial Strategy for South East Vale Sub-Area

Stagecoach considers this aspect of the Plan to be

4 i) Legally compliant	Y
4 ii) Sound	N
4 iii) Complies with the Duty to Co-operate	Y

5) Reasons why Stagecoach considers the Plan policy to be unsound:

Stagecoach recognises the scale and ambition of the Science Vale vision, crossing two local authority boundaries, and directly impinging on a wider area, makes further detailed planning through an Area Action Plan necessary.

This Plan also can flow from, and take account of, detailed technical work including transport modelling outputs, that to date have understandably struggled to keep up with the pace of Plan-making, within the overarching objectives and strategy set out in the current Plan.

Stagecoach supports, in the main, the spatial strategy and overall vision for the South East Vale sub-area. Much of the development in the Wantage and Grove area is already committed in terms of outline consent in any case, while large-scale development contributing to Didcot's planned growth is already well underway.

However the emphasis of the vision, and the policy language that flows from that within the Plan, is highly focused on providing for car-borne movements first. While improvements to public transport are repeatedly referred to, there is little or no definition of how this will be specified or accomplished, and at least as importantly, funded. "Improved public transport" and "improvements to public transport" referred to in the Plan language here and elsewhere, is something Stagecoach for one is already committed to, as far it can identify sustainable opportunity, irrespective of the Plan and its language. What is still needed is a much clearer vision that then is taken forward into a much more rigorous and more focused policy intent, delivery mechanisms, and required outcomes, even if the detail of the schemes still needs refinement, to ensure that the legal requirements for Plan-making are met.

Essentially, the Plan and the supporting IDP for the South-Eastern Vale, are so focused on high-cost highways capital schemes, that it remains highly unclear to Stagecoach that funding will be available to secure significant public transport improvements alongside these.

Thus the Plan is in this respect unsound, being insufficiently positively prepared to ensure that the public transport infrastructure requirements of the Plan are sufficiently well-defined and -costed, and that can be delivered as part of an holistic and demonstrably effective transport strategy. Indeed LTP4 and the Science Vale Transport Strategy are still not in the public domain.

Stagecoach supports in the main, the spatial strategy of development as being the most appropriate in the circumstances, when the reasonable alternatives are considered, and thus sound in terms of the definitions within NPPF paragraph 182.

Stagecoach does not, however, see the logic underpinning strategic-scale allocation of housing at **Milton Heights**. We have made this point in previous representations.

This settlement and location is not sustainable, and the Council accepts in its own evidence and draft policy that it at best could be characterised as a smaller village, able to sustain at best, in terms of the settlement hierarchy, very limited development meeting local needs on a rural exceptions basis.

It is severed from local employment by a trunk road and major interchange, and a main line railway. This isolation is exacerbated further on the north and eastern sides by major changes in levels. It is far from clear that local bus service could be efficiently diverted to serve the area, without adding excessive circuitry, undermining their efficiency and attractiveness to the bulk of existing and future users. Nor would the relatively limited quantum of development proposed, 400 units, come close to sustaining revenue able to defray the costs of providing a high-quality bus service here.

However, it is notable that the draft allocation is double that typically being proposed for much larger and more sustainable villages, many of which already benefit from direct public transport operating up to half-hourly, and a much wider range of local facilities and amenities. In effect the scale of development is tantamount to a new settlement in view of the relationship with the existing settlement, though the scale of the combined entity is still well below the 1000-1200 units that is required to support effective primary school provision, local convenience retail, and community amenities such as a pub.

It is very evident though by its location directly adjacent to a junction on a national primary highway, that this location would be especially attractive to long-distance car-borne commuting. Given the serious deleterious impacts this has on the operation both of that network, and the cumulative impacts of traffic from this proposed development and others like it, elsewhere in the County and beyond, (where the resulting congestion could be expected to further undermine bus operations closer to journey destinations) we regard this as entirely unacceptable, even if it could be demonstrated that the highways network immediately adjacent to the proposed allocation could accommodate this car-borne traffic.

The draft allocation is unsound, being inconsistent with principles of sustainable development national policy expressed in NPPF paragraph 17, 29, 32 and 35.

6) Stagecoach suggests the following modifications to make the Plan sound:

**Stagecoach urges either that this allocation be deleted**, as it is a location that is both unsustainable and not credibly able to be made sustainable at the scale proposed, **OR alternatively, that a new settlement incorporating that existing be proposed**, incorporating at least 1000 units structured around a high-quality public transport spine route through the centre of the development footprint, and affording seamless bus priority between Steventon lights, via the site, to both Valley Park (NW) (potentially with a new crossing over A34 avoiding the interchange), and Rowstock/Harwell.

## **Core Policy 17: Delivery of Strategic Highway Improvements within the South-East Vale Sub-Area**

Stagecoach considers this aspect of the Plan to be

4 i) Legally compliant	Y
4 ii) Sound	N
4 iii) Complies with the Duty to Co-operate	Y

5) Reasons why Stagecoach considers the Plan policy to be unsound:

Stagecoach recognises that public transport improvements have a far greater and more explicit status in the submission Plan than in previous consultation drafts. This is welcome, and necessary.

In particular, Stagecoach notes and welcomes that a specific reference is now made to a “priority bus system” between Didcot and Harwell, which we consider to be a major opportunity for a radical rebalancing of local transport towards more sustainable modes. We remain in dialogue with OCC on the detail of how this might be taken forward. We note, too that OCC, Vale and SODC officers are currently in ongoing discussions with promoters of the strategic allocations west of Didcot with a view to defining how master planning can bring this concept about in some way.

Stagecoach remains committed to supporting promoters and development management professionals in finessing proposals, alongside the plan-making process.

In line with our comments above related to the spatial vision and strategy, Stagecoach notes with continuing concern that a very comprehensive programme of road-based improvements remain, essentially, at the heart of the transport strategy set out in the Plan and the IDP.

In fact, quite understandably, the list of likely required highways schemes continues to lengthen, given the serious and chronic nature of current problems, and scale of development proposed. Stagecoach is not in principle, opposed to these schemes, either those previously proposed, or now emergent as a result of further modelling and refinement as a result on ongoing parallel work on LTP4 and the Science Vale Transport Strategy.

In fact, many, indeed probably most of these roads-based schemes could be expected to have significant public transport benefits, particularly if bus priority measures are built in, especially on approach to, and at key junctions. However the Plan makes no reference to this kind of principle.

Most significant, the addition in the submission draft plan of a new proposed link between Didcot and Culham, including a new Thames Crossing, offers a very significant and welcome opportunity to provide high-quality public transport links between Didcot and the existing and future employment opportunities in the Oxford Eastern Arc, where today, no credible public transport alternative to car use is available. Subject to detailed design, this could act as a catalyst to very significant mode shift.

However, the list of highways driven schemes is long, getting longer, and is clearly going to be exceedingly expensive to deliver, notwithstanding the welcome commitment of significant funds in principle from HM Treasury through the Growth Deal, LSTF, and other streams. Many involve both

long lengths of roads and complex structures, over both railways and floodplains, where in many cases, such as the “Science Bridge” it is readily apparent that ground conditions and current ground levels do not assist, greatly adding to foreseeable engineering risks, costs and complexity.

While the Science Vale Transport Strategy remains a “work in progress” it is not possible to be certain that a rebalancing of transport towards sustainable modes in line with NPPF paragraph 17 and paras 29-35 is even achievable, even if it were the clear and consistent intent of the Plan, which regrettably it still does not appear to be. There is still relatively little evidence that the Plan complies with NPPF paragraph 41, where investments in sustainable transport are prioritised in order to reduce the need for costly additional transport infrastructure.

Rather, the sense is that public transport improvements will to a very great extent in practice, merely supplement road improvements for general traffic, and be subordinate in priority in every sense, including, very importantly, political priority and funding.

Stagecoach remains concerned too, that there is an apparent confusion within the Plan and supporting IDP, as to how bus service enhancements are to be funded. The IDP schedules refer to both CIL and s106 funding mechanisms.

Many large-scale consented schemes are already committed to a s106 funding route, which at least gives comfort that funds are identified for specified public transport improvements related to the site concerned.

However, a CIL model will create a single common funding pot, on which there will be multiple pressing draws: not just highways, but matters such as education capacity, which clearly are objective demands on the resource and cannot easily justify being avoided or deferred. Public transport enhancements look much more likely to be relegated to the “less than essential” category. The fact that they will involve revenue support rather than capital investment, makes it even more likely that, should CIL funding be under serious pressure, there will be no prospect of other funding becoming available from the public purse.

Stagecoach strongly believes that as well as giving greater certainty and transparency of delivery route, with a good deal of flexibility, a s106 funding model for public transport improvements can be defined for each major site within the overarching vision set out within the emerging SVTS, that allows individual strategic sites to deliver a “modular” element of the public transport improvement strategy, and in such a way that the legal complexities surrounding procurement can be avoided.

## Core Policy 18: Safeguarding of Land for Transport Schemes in the South East Vale Sub- Area

Stagecoach considers this aspect of the Plan to be

4 i) Legally compliant	Y
4 ii) Sound	N
4 iii) Complies with the Duty to Co-operate	Y

5) Reasons why Stagecoach considers the Plan policy to be unsound:

Delivery of efficient and direct public transport to or through new developments is in itself a matter that is exceptionally easy to compromise through inconsiderate urban design. Even within Oxfordshire, there are multiple recent developments of significant size where, despite the intent of master planners and transport strategies supporting their conception, it is practically impossible to penetrate with bus services, or to provide convenient access for residents to nearby services. Madley Park in Witney and Shilton Park in Carterton are some examples.

If it is appropriate for Policy to set out formally the principle that identified highways schemes should not be compromised, then certainly, in line with NPPF paragraphs 17 and 32, Policy to avoid the same kind of prejudice to delivery of high-quality public transport services also needs to be stated.

The current Policy wording is out of conformity with national policy and thus is unsound according to the definitions in NPPF para 182.

6) Stagecoach suggests the following modifications to make the Plan sound:

This can be resolved by amending the text as follows:

**“new development in these areas, *including master-planning for all developments of strategic scale*, should be carefully designed having regard to matters such as building layout, noise insulation, landscaping, and means of access, *including facilitating safe and efficient progress of bus services through developments where appropriate, and maximising accessibility to and by sustainable modes over personal car use.*”**

## Core Policy 20: Spatial Strategy for Western Vale Sub-Area

Stagecoach considers this aspect of the Plan to be

4 i) Legally compliant	Y
4 ii) Sound	Y
4 iii) Complies with the Duty to Co-operate	Y

5) Reasons why Stagecoach considers the Plan policy to be sound:

Stagecoach supports the strategy for the Western Vale Sub-area.

Indeed, our Stagecoach West business has already initiated in summer 2014, significant improvements to peak-time service frequency on the A420 corridor, where service 66 provides up to three buses/hour in each direction, featuring premium “Gold”-branded high-specification vehicles. Virtually all the proposed allocations, with the exception of Stanford in-the-Vale, and parts of North Shrivensham, would be within 500m walk of existing or potential new stops on this service.

Stagecoach West and Stagecoach in Oxfordshire continue to evaluate ways with County officers, to improve services in this area in the short-medium term, with a view to providing both sufficient capacity and quality of service frequency to provide a still-better offer to motorists, and to accommodate needs arising from the emerging quantum of growth that looks likely to be delivered, much of it short-term.

The “corridor” focus of the development strategy is certainly the most effective way of delivering progressive improvements to public transport, not least securing and potentially further enhancing evening and Sunday services. This could, longer-term, conceivably involve improvements in the public transport offer between Faringdon and the Cotswolds, depending on how the network and demand develops in Gloucestershire.

We also note, and greatly welcome, the recognition in paragraph 5.125-5.126 that junction improvements on A420 at Coxwell Road, and west of Shrivensham in particular, are to be taken forward, improving the safe and efficient operation of both existing service and its further improvement. We thus support the identification of a further modest additional quantum in both Shrivensham and Kingston Bagpuize, since to site these homes elsewhere would in all probability lead to a very higher degree of car dependence relative to what is achievable in these locations.

Stagecoach West would also wish to advise that they are feeding in to ongoing discussion with applicants and DM colleagues on both side of the County Boundary, with regard to the role public transport can and should play in facilitating sustainable development on the A420. We share the concerns of all stakeholders about congestion on the A420, in particular on the approaches to Swindon at the White Hart Interchange, and at South Marston, both within Swindon Borough.

For the avoidance of doubt, we consider that service 66 should be seen as providing a major inter-urban strategic public transport link, and be developed as such, focused as the first priority on cross boundary trips originating /terminating within Oxfordshire. Separate bus service development



initiatives will be needed within Swindon Borough to support a high public transport mode share to and from Swindon Eastern Villages, as proposals are brought forward.

6) Stagecoach suggests the following modifications to make the Plan sound:

**Not applicable**

**Core Policy 21: Safeguarding of Land for Strategic Highway Improvements within the Western Vale Sub-Area**

Stagecoach considers this aspect of the Plan to be

- |   |   |
|---|---|
| 4 i) Legally compliant                      | Y |
| 4 ii) Sound                                 | Y |
| 4 iii) Complies with the Duty to Co-operate | Y |

5) Reasons why Stagecoach considers the Plan policy to be sound:

The approach and specific junction improvements will materially assist in providing more reliable and potentially slightly faster journeys on the A420 corridor, especially at peak times.

We urge that, where possible and required, bus priority on approach to the junctions concerned be incorporated as designs for schemes are designed in detail.

Stagecoach supports this Policy.

6) Stagecoach suggests the following modifications to make the Plan sound:

**Not applicable**

### Core Policy 33: Promoting Sustainable Transport and Accessibility

Stagecoach considers this aspect of the Plan to be

4 i) Legally compliant	Y
4 ii) Sound	N
4 iii) Complies with the Duty to Co-operate	Y

5) Reasons why Stagecoach considers the Plan policy to be unsound:

Stagecoach welcomes this Policy heading, which is essential if the Plan is to conform with national policy.

However the Policy is weak and inspecific, and seems to function in its current form as a totemic or tokenistic element within the Plan. The Policy is thus ineffective.

It is no doubt partly because the work to define measures within LTP and SVTS is still underway, that this is the case. While Stagecoach readily understands the great constraints and challenges facing the Planning authority and the County, that make this impossible to avoid, it remains a matter of great concern.

**It is worth mentioning that, within the Science Vale AAP area, a strong and robust higher-level policy will be essential to ensure all development makes full provision to place sustainable transport at the centre.**

We are aware that development proposals for the Orchard Centre Phase 2 within, the AAP area in South Oxfordshire, are aiming to marginalise bus services, and access by bus, to such a great extent that it is likely to prove impossible to provide convenient bus access either to those proposals, or, even worse, the town centre as a whole. This is completely unacceptable. Stagecoach is greatly concerned that approach taken on this strategically important project reflects a tendency in practice, for Development Control decisions to take much less regard to Policy than is due, in the light of local circumstances and perceived pressures.

## Core Policy 35: Promoting Public Transport, Cycling and Walking

Stagecoach considers this aspect of the Plan to be

4 i) Legally compliant	Y
4 ii) Sound	N
4 iii) Complies with the Duty to Co-operate	Y

5) Reasons why Stagecoach considers the Plan policy to be unsound:

Stagecoach welcomes this Policy heading, which is essential if the Plan is to conform with national policy.

However, the policy is non-committal on the imperative to achieve mode shift towards sustainable modes, and is weakly drafted, with insufficiently robust statement of intent. This is despite the fact that modelling supporting the Plan makes clear that this mode shift is essential, even if all the other highways capacity schemes are delivered. The Policy is currently ineffective and risks the Plan being out-of conformity with NPPF paragraph 17 and 29-36, and para 41.

It seems likely that LTP4 and the Science Vale Transport Strategy will, based on transport modelling outputs, need to secure this mode shift, at a quite ambitious level. This will not be an alternative to the schemes listed in the Plan and IDP, it seems certain to be an essential part of the SVTS. It is thus essential that the Plan aligns with that necessary objective. The fact the SVTS is not fully defined is not helpful, of course, but enough is known to make this a reasonable

The Policy also assumes that urban design need only consider prioritising access to and through sites by walking and cycling.

In large parts of the Vale, especially the Western Vale, the proposed development strategy does indeed place development to a great extent alongside, or within easy walking reach of existing bus corridors. We recognise and welcome that easy pedestrian (and where appropriate, cycle) access to public transport stops and hubs is required by this policy. This is demonstrably effective, as can be seen by the high level of use of bike racks sited at bus stops on major inter-urban bus corridors, such as on service S1/S2 in Witney and Eynsham, or on X39/X40 within South Oxfordshire.

Given the very great distances that many residents will need to cover to access jobs education and facilities within and beyond the Plan area (notwithstanding other policies in the Plan) the lack of reference to appropriate design of developments to facilitate efficient bus penetration, where warranted and appropriate, is nevertheless a major and troubling omission.

Delivery of efficient and direct public transport to or through new developments is in itself a matter that is exceptionally easy to compromise through inconsiderate urban design. Even within Oxfordshire, there are multiple recent developments of significant size where, despite the intent of master planners and transport strategies supporting their conception, it is practically impossible to penetrate with bus services, or to provide convenient access for residents to nearby services. Madley Park in Witney and Shilton Park in Carterton are some examples.

If it is appropriate for Policy to set out formally the principle that identified highways schemes should not be compromised, then certainly, in line with NPPF paragraphs 17 and 32, Policy to avoid

the same kind of prejudice to delivery of high-quality public transport services also needs to be stated.

The current Policy wording in CP35 is out of conformity with national policy and thus is unsound according to the definitions in NPPF para 182.

This would be less of an issue if Policy at CP38 were to more explicitly place facilitation of sustainable modes at the heart of urban design on strategic sites, as it appropriately might. It does not. Indeed, there is relatively very little reference in that policy to the need for urban design to accommodate and prioritise sustainable modes, and their use. We tend to see, too often, an approach where aesthetic and historicist sensibilities and priorities are seen as needing to drive the process of detailed design, leaving sustainable accessibility and movement so far down the hierarchy of considerations that, at the actual design stage, and in DM discussions, they almost vanish. This kind of approach is, no doubt, one major reason for the inability of much recent large-scale development in the County to permit practical access by bus services.

6) Stagecoach suggests the following modifications to make the Plan sound:

This can be resolved by amending the text in Policy CP18 as follows, as separately submitted, given that this issue is related, in principle, to the larger scale urban extensions proposed for Didcot and the Central Science Vale:

“new development in these areas, ***including master-planning for all developments of strategic scale***, should be carefully designed having regard to matters such as building layout, noise insulation, landscaping, and means of access, ***including facilitating safe and efficient progress of bus services through developments (including bus priority and segregation) where appropriate, and maximising accessibility to and by sustainable modes over personal car use.***”

In addition Policy CP35 should be amended to read:

“The Council will work with Oxfordshire County Council, ***transport providers, developers at pre-application stage***, and other groups, to:

- i. Encourage the use of sustainable modes of transport and ~~support~~ ***define and deliver*** measures that ***both enable and deliver a significant*** mode shift to public transport, walking and cycling within the District ***and especially within the Science Vale AAP area.***”
- ii. ...”
- iii. (new section iii., renumber successive as required) ***Scope, identify and progress specific measures and schemes to facilitate high quality bus services serving existing and current committed new development, and ensure that all developments facilitate the best possible accessibility by public transport, whether routed within the site or nearby. This will include, in particular, a strategic priority bus corridor between Didcot and Harwell, including segregated running for buses where appropriate***”
- iv. (etc.) ...”

## Core Policy 38: Design Strategies for Strategic and Major Development Sites

Stagecoach considers this aspect of the Plan to be

4 i) Legally compliant	Y
4 ii) Sound	N
4 iii) Complies with the Duty to Co-operate	Y

5) Reasons why Stagecoach considers the Plan policy to be unsound:

It greatly troubles Stagecoach that Policy for urban design is set out in a way that is agnostic to the role of good urban design in facilitating the rebalancing of transport towards more sustainable modes, in line with national Policy. Indeed, it is at the point that detailed master-planning of urban extension are conceived, that the opportunities for sustainable transport, and bus services in particular, are either facilitated, or totally precluded. The nature of bus operations means that it is rare for there to be some kind of middle ground.

As signalled at Policy CP18 and CP 35, this is a very critical matter, for the effective delivery of the objectives of the Plan. If on strategic sites, the only public transport is available on the very edges, over 1000m away, or is relegated to slow and contorted routes meandering through large-scale development, it will be impossible to offer an attractive public transport choice.

This is clearly evidenced on major recent developments, across the UK. An especially good example is the Swindon Northern Development Area, which in scale is broadly comparable with the combined quantum of committed development at Great Western Park, and the proposed allocations at Valley Park. Buses must negotiate convoluted routes, on often relatively narrow roads, further greatly hindered by widespread on-street parking. As a result, buses take over 20 minutes to travel from one end of the scheme to the other, within which time, even at peak times, a motorist is on the strategic network and a good way toward their local destination.

This risks being the outcome within Science Vale, without consistent strong urban design “rules” that structure placemaking around high-quality public transport arteries: the “bus priority system” mentioned just once at Policy CP18 between Didcot and Harwell, being only the apogee of such an approach.

Nor is it the case that a potential bus network improvement be defined, or costed, for such Policy to be a clear necessity: indeed, without it, delivery of any meaningful network enhancement is likely to be practically closed off before a single new home is built on the schemes in question.

Given the nature of the current limited public transport offer, and the complex and polycentric nature of current and likely future travel demands, which make walking and cycling impractical for a lot of journey demands, this surely must be viewed as a key structuring priority within the Plan. Despite some good progress in developing the Plan to take better account of the need to “hard-wire” bus service improvements within it, it remains perplexing and troubling to us that this still hasn’t been taken up with much vigour or apparent thought.

This is possibly the single biggest weakness in the Plan. It seems to reflect a common approach in land-use planning, where aesthetic and historicist sensibilities and priorities are seen as needing to drive the process of detailed design, leaving sustainable accessibility and movement so far down the hierarchy of considerations that, at that stage proposals are actually worked up, they almost vanish.

Regrettably as Stagecoach responds to specific major development proposals in the County and far beyond, we are faced with the very unhelpful results of this approach regularly and repeatedly.

It is evident that it is urban design orthodoxy that represents the single biggest reason why so much recent large-scale residential development in recent years is unable to support a marketable commercial high-quality bus service, both in Oxfordshire and elsewhere. In fact, large scale urban extensions built over the last 20-25 years are amongst the most difficult places to design, operate and sustain bus services on a commercial basis.

Stagecoach recognises, very well, the often difficult tensions between good placemaking and highways engineering, especially where something as big as a bus is concerned. However, this is no reason to shy away from grasping the challenge firmly in policy: quite the contrary. To avoid the line of least resistance being taken by designers, policy needs to set out, in juxtaposition, the tensions the designer must resolve. Good design, and effective designers, are able to creatively resolve these challenges.

6) Stagecoach suggests the following modifications to make the Plan sound:

To make the Policy CP38 effective, working with the other Policies in the Plan and consistent with the strategic objectives, reliance could to a significant degree be placed on strengthened Policies CP18 and CP35. However CP38 could appropriately be amended to read:

“ ...

- Integrate with surrounding historic, built and natural environments, in particular maximising existing and potential movement connections, and accessibility, to ~~encourage~~ **facilitate the greatest possible** use of walking, cycling and public transport, **including measures to structure development where appropriate to facilitate delivery of efficient and direct public transport routes, incorporating full segregation of bus movements from general traffic where appropriate.**”